

Service Blueprint: SNAP Work Requirements (1/2)

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, and, if they're not exempt, if they are meeting work requirements already

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

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

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

CLIENT ACTION

Often times clients need to submit additional verifications.

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

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

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

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

Determine eligibility, and if and how work requirements apply

Staff run eligibility for the household's case and get an outcome and SNAP benefit amount

STAFF ACTION

Eligibility systems run their rules on the data entered on a case to make the determination

SYSTEM

Staff manually mark in the eligibility system if any exemptions apply to the client

STAFF ACTION

Based off of information from the application, interview, database checks, and submitted verification documents

Staff may have to click in many areas of the eligibility system to determine if a client is eligible for any exemptions.

PAIN POINT

Some eligibility systems have exemption logic coded in, but some do not.

Eligibility systems could automatically determine what exemptions apply based on what is input on the client's case.

OPPORTUNITY

Staff might consult colleagues on whether this client's situation qualifies as "unfit for work."

STAFF ACTION

For example, a less experienced staff member may ask their supervisor for their perspective

States can also apply discretionary exemptions

POLICY

Discretionary exemptions can be used for certain areas of the state or types of cases so that those cases are not subject to work requirements.

Some states are prevented by state law from using them at all or they can only be used in specific ways.

In some states, staff have to set a benefits certification period for each case.

STAFF ACTION

Certification periods determine when a client would need to submit documents to maintain or lose their benefits.

States can decide how they broadly set certification periods for SNAP clients.

POLICY

Regulation encourages states to choose the longest certification period possible (minimum of 6 months), unless the household contains someone who is considered an "Able-Bodied Adult Without Dependents" (ABAWD) or has temporary circumstances that might make them ineligible soon.

Some states choose for all ABAWDs to have a 4-month certification period.

Limit the individualized decision making and any related manual updating that caseworkers need to do to set a certification period length

BEST PRACTICE

States participating in the Elderly Simplified Reporting Project (ESAP) offer 36-month certification periods for elderly clients

POLICY

Clients on ESAP must be 60 years or older.

Client gets notified of their eligibility determination and if they have work requirements

CLIENT ACTION

This will be a paper notice, sometimes an e-notice as well.

The notice should include:

- Benefit amount
- Certification period
- Work requirement details plus time limit details
- Exemption status
- Required actions

Notices explaining work requirements are often confusing or unclear.

PAIN POINT

Clients commonly do not understand what work requirements mean, and what they have to do to be compliant. This leads clients to lose benefits unexpectedly, and has downstream impacts on staff time to help.

Improve notices and communications when work requirements are first communicated to clients

OPPORTUNITY

FNS has created several sample notices and communication scripts that can be a starting point:

- Notice Review Tool (NRT) - Consolidated Work Requirements
- Model Notice - Consolidated Work Requirements
- Model Notice (Annotated) - Consolidated Work Requirements
- Work Requirements Oral Script for State Agencies

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

CLIENT ACTION

In some states, all clients subject to work requirements must be referred to E&T

In other states, E&T is voluntary and open to all clients

CODE for AMERICA

Last updated: Sept. 10, 2025

Service Blueprint: SNAP Work Requirements (2/2)

Referral to Employment & Training (E&T) and ongoing engagement to fulfill work requirements

