

ABAWD Q's and A's

January, 2018

Work Registration is a requirement for all SNAP recipients, this document pertains specifically to those individuals who are work registered as an ABAWD.

1. Who is an ABAWD? 2438.17.00/2438.17.05

An ABAWD is an able bodied adult without dependents. An ABAWD is:

- Between ages of 18 – 49
- Does not reside in an assistance group with a child under 18
- Not pregnant
- Mentally or physically fit for employment (including those medically frail for HIP)

In order to remain eligible, an ABAWD must meet the ABAWD work requirement which is:

- working an average of 20 hours per week, or an average of 80 hours per month or;
- participating in IMPACT activities 20 hours per week, or;
- combination of both for an average of 20 hours per week ; or
- participating in Community Work Experience Program (CWEP)

Failure to meet the work requirement results in benefits being limited to 3 months within the fixed 36 month period, which began July, 2015 (the next fixed period will begin July 1, 2018)

2. What are the requirements to be compliant with Community Work Experience Program (CWEP)? 2540.10.30.10

- The requirement for CWEP is **NOT** 20 hours per week; it is based on the formula: Amount of SNAP monthly benefit divided by Federal Minimum Wage. As an example:

Client's monthly benefit is \$193: $193/7.25= 26$. The client would be required to perform 26 hours per **month** of Community Work Experience to be compliant.

3. How do we track compliance?

- The ABAWD is coded as 03 for Work Registration (WORK REG) and 03 for Referral (REF CODE for referral to IMPACT) on AEIWP.
- ICES will auto fill AEABA tracking screen according to what case specific information has been entered into ICES eligibility screens.
- If client is working an average of 20 hours per week, ICES will populate AEABA with a "W" **DO NOT CHANGE WR CODE TO 01 BECAUSE CLIENT IS WORKING**

- If client is participating with IMPACT 20 hours per week, or per the formula for CWEP, ICES will populate AEABA with a “C”
- If client is working **and** participating with IMPACT to meet the requirement, ICES will populate AEABA with a “J”
- If client is not complying, ICES will populate AEABA with an “M”

Entering Income Hours Correctly:

- Self-employment and earned income hours must be verified and entered correctly. Do not populate AEISE with 120 hours, but **use verified hours** of self-employment. When employment is terminated, it must be terminated on AEISE or AEIEI so that codes for AEABA can be properly calculated.
- Informal self-employment such as babysitting or odd jobs is difficult to verify, but the client is required to provide verification of hours and income. (example: Client who is babysitting should provide a statement from the person for whom they are babysitting that details hours and pay)
- If the hours and income are questionable, then it is appropriate and necessary to question the client, and confirm to the best of our ability, the validity of reported employment.

❖ ***Client’s work registration coding should NOT be changed because they are employed unless they meet exemption 15. Exemption 15 is for clients who are working at least 30 hours per week at minimum wage or have earned income equal to at least 30 hours x minimum wage. This change should ONLY be made IF CLIENT IS WORKING 30 HOURS PER WEEK (or income equivalent of 30 x min. wage) EVERY WEEK.***

❖ ***If you are unsure that client is working 30 hours (or financial equivalent) every week, do not change to a 15. Client will remain compliant as long as working a minimum of 80 hours per month***

3. What if an individual participates in an Americorp program?

- Americorp earnings are exempt for SNAP (Coded as AC on AEIEI), however, employment hours count to make an individual who is an ABAWD compliant, be sure to accurately record hours of employment.

4. What if a change needs to be made because the code isn’t correct?

- If the code on AEABA is not correct, the SEM has override capability and can manually enter the change on AEABA. All manual changes should be considered very carefully to ensure the correct code is entered. Any questions should be forwarded to SNAP policy.
- ***NOTE: Once the SEM makes a data entry change, the system will not override any month the SEM has manually made a data entry change. This is why it is absolutely necessary that all manual changes be carefully considered and correct.***

Contact SNAP policy with any questions about changes to AEABA

5. When would a supervisor be required to override screen AEABA?

- There will be times when a review is needed in order to determine the correctness of AEABA.
- If a client verifies compliance through work or IMPACT participation late in the month, a manual update for that month would be required
- If client is ***within*** the 3 month eligibility period for ABAWDs and verifies working an average of 80 hours per month, the months in question would need to be manually changed to reflect working
- If ICES incorrectly codes a month
- Requests from Maximus for a manual change to AEABA must be thoroughly documented, sent through the regional mailbox, and documented on WPA1 notes. *If these conditions do not exist, do not make a change.*

Any manual changes to AEABA should be given careful consideration and any questions about the validity of a change to AEABA should be directed to SNAP policy. Codes for AEABA can be found on table TABA.

6. How does an ABAWD fail?

- Once an ABAWD has 3 months of noncompliance (3 months of M codes), the system will auto fill AEABA with code F for the month after the client has closed. These months of noncompliance do not need to be consecutive. ICES has been programmed to identify these cases and will run a mass change auto closure on a specified date.

- Do not refer a client to IMPACT who is WITHIN the 3rd month of non-compliance, and has not been working with IMPACT already. Client will need to find another method of becoming compliant (employment and/or E & T services outside of DFR)
- Once an ABAWD has failed, they will be ineligible for the remainder of the 36 month fixed period unless they have regained eligibility.
- **Do not refer an individual who has failed and reapplies for SNAP to IMPACT.** The client is not sanctioned and therefore there is no “cure” for the sanction by participating with IMPACT. Eligibility can be regained as explained below.

7. If a client loses eligibility, how can eligibility be regained? 2438.17.15

- If a client is non-compliant with ABAWD work requirements for 3 months within the 36 month period, SNAP benefits will be discontinued. A client can regain compliance within the 36 month period by doing one of the following:
 - Working a minimum of 80 hours within a 30 day period;
 - Complying with an approved employment and training program for a minimum of 20 hours per week over a 30 day period (this would be with an agency such as Division of Workforce Development, or another agency)
Non-recipients are not eligible for services from IMPACT)
 - SNAP Policy must approve the alternate program if it is to be counted towards ABAWD compliance.
 - A combination of work and participation in an approved E & T program for a minimum of 80 hours over a 30 day period.
 - **Any time that an individual regains eligibility, the existing F on AEABA must be changed to N. If an F exists on AEABA, ICES will not auto close the individual in the future, which can create a payment error. There is an edit built into AEABA as a reminder that an “active code” (W/C/J) requires that the previous F be changed to an N.**

8. What if an ABAWD has been referred to Voc Rehab?

- If an ABAWD has been referred to Vocational Rehabilitation, the ABAWD is exempt from work registration during the time period he/she is participating in Voc Rehab. After the completion of this activity, the client could become an ABAWD if there is no mental or physical disability.

- If the client is already in Voc Rehab at application point, the client should be exempted from work registration until the work registration status is reviewed at recertification point. Work Registration Code 11 would be used on AEIWP.

9. What if an individual indicates they were incarcerated during the months they were considered non-compliant?

- If an individual was considered an ABAWD and received SNAP benefits, non-compliant months will not be reversed on AEABA. The client had the option to report that they were incarcerated which would have been processed as a change and client would not have used the non-compliant months of time limited benefits.

10. How can mental/physical fitness for work be determined for an ABAWD?

- A State Eligibility Consultant or State Eligibility Manager can determine an ABAWD is physically or mentally unfit for work if the issue is observable;
- A client who claims to be physically or mentally unfit for work, but is not known to our system to be disabled, and is not observed to be mentally or physically unfit for work, can provide a statement from a medical professional that defines the client's limitations regarding work, as well as how long the inability to work is projected to last.
- Client may become disabled, receiving Social Security Disability or SSI, or considered "medically frail" for HIP. .
- If a client is receiving **any** disability benefit from Veterans Administration (a percentage less than 100% or a full disability benefit), they **are** considered unfit for work.

11. Are there any codes the system will not auto fill for screen AEABA?

- Yes, the system will not auto fill codes V (claim for ABAWD needed) and X (one time 3 month extension).

12. How does the one-time 3 month extension work? 2438.17.20

- If a client received 3 non-compliant months and had SNAP benefits discontinued, became compliant through working a minimum of 80 hours over a 30 day period while off of SNAP benefits, then lost employment, they may be eligible for a one-time 3 month extension upon reapplication. **Evaluate case for the following conditions:**

- Client’s benefits were discontinued after 3 months of non-compliance (3 M’s)
- Client has reapplied
- Client verifies employment was minimally 80 hours within a 30 day period while not on benefits
- Client has lost employment
- Client is not subject to voluntary quit penalty

The following steps would be taken upon client being determined eligible for the onetime 3 month extension:

- Previous “F” must be changed to an “N”
- Month of application would be prorated if appropriate
- 3 consecutive months after pro-rated month would be manually coded “X”
 - X codes must always be coded as 3 consecutive months

Below is an example of how AEABA may be coded in such a situation (most recent app date August 15):

Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov
M	M	M	F	N	N	N			

Changes that need to be made:

Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov
M	M	M	N	N	N	P	X	X	X

13. Client inquiries regarding ABAWD status:

- If client needs to reschedule a missed appointment with IMPACT, or speak with an IMPACT caseworker, client should be referred to the 800 number, option #3
- Clients should not be referred to IMPACT once eligibility is lost
- All other ABAWD compliance and policy issues should be answered by eligibility staff

IF the client's benefits have been discontinued:

- **Do not refer client to IMPACT**
- Provide client with information on regaining eligibility
- Advise client that the best way to regain eligibility is to become employed a minimum of 80 hours per month

Some details and reminders:

1. All ABAWDs are scheduled for an appointment upon their initial authorization as an ABAWD, any reschedules after missed appointment, or after case closure and re-authorization, are the responsibility of the client.
2. Working with IMPACT is not the only way to be compliant, employment of an average of 80 hours per month, or participation in another approved program (each program is approved on an individual basis) are other ways of maintaining eligibility, or regaining eligibility once it is lost. DFR does not maintain a list of approved programs as we offer all the opportunity to utilize IMPACT upon initial authorization.
4. Compliance by working is determined by the number of hours that are worked, not the amount of income. There is no minimum hourly wage requirement for SNAP. However, this is an opportunity to encourage unemployed or underemployed individuals to take advantage of free employment and training services offered through DFR.

If you have any questions regarding proper work registration coding, proper coding on AEABA, or any other matter relating to work registration or ABAWDs, please refer to the policy manual, and if you are still unclear, please contact SNAP policy.