VIRGINIA DEPARTMENT OF
SOCIAL SERVICES

Charting the Course: Navigating Work Requirements Through Coordinated Service Delivery Roundtable Discussion

Fall BPRO 2026

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Ice Breaker

Name
Agency
Title

What's one thing your team does well and one thing your team could do better?

What H.R.1 changed

Public Law 119-21, enacted July 4, 2025. The work requirement is the part that lands on all of us.

MEDICAID — Effective January 1, 2027

- New work requirements for adults with Medicaid Expansion coverage.
- Eligibility renewals every 6 months instead of every 12.
- Certain individuals must work, go to school, volunteer, or qualify for an exemption to stay covered.
- Expansion members get a notice by September 30, 2026 explaining the new requirement.

SNAP — In effect now

- The work requirement age ceiling rises from 55 to 65.
- The dependent-child exemption drops from under 18 to under 14.
- Exemptions end for veterans, people experiencing homelessness, and foster youth 18 to 24.
- Locality waivers for a lack of jobs end. Waivers now require unemployment above 10%.

AND A COST SHIFT ONTO THE STATE

- Virginia picks up 75% of SNAP administrative costs from October 1, 2026, roughly $94m more a year.
- From October 1, 2027 the state also matches 0 to 15% of SNAP benefit costs, set by its payment error rate.

The new part is not the benefit rules. It is that keeping coverage now depends on a documented work, education, volunteer or training activity, which makes it a workforce problem.

Medicaid: who has to meet the requirement

Expansion adults only. About 550,000 Virginians are covered, and as many as 300,000 may be at risk.

WHO IT APPLIES TO

- Adults 19 through 64 with Medicaid Expansion coverage.
- Income below 138% of the federal poverty level, $22,025 a year for an individual.
- Not eligible for Medicare.
- Children, pregnant members and adults 65 and over are not affected.

WHAT THEY HAVE TO DO

- At least one qualifying activity in a given month, totaling 80 hours.
- Work, education, volunteering, or work training. Any combination counts.
- New applicants must have met it the month before applying.
- Existing members need 1 month since their last determination or renewal.

WHEN IT STARTS

- New applicants: January 1, 2027.
- Existing members: at their first 2027 renewal, from March 2027 onward.
- Self-attestation is accepted for most exemptions and activities in 2027.
- Documentation requirements begin in 2028.

THE EXEMPTIONS ARE BROAD

Pregnant or within 12 months postpartum, medically frail, caregiver of a child under 14 or of a person with a disability, veterans with a 100% disability rating, anyone already meeting SNAP or TANF work requirements, American Indian and Alaska Native individuals, former foster youth up to age 26, and others.

SNAP: what changed for the work requirement

The ABAWD rules widened, and unlike Medicaid they are in effect now

WHAT CHANGED

- The maximum age for the work requirement rises from 55 to 65.
- The dependent-child exemption drops from under 18 to under 14.
- Exemptions end for veterans, people experiencing homelessness, and foster youth 18 to 24.
- A new exception is added for American Indian, Urban Indian and California Indian individuals.
- Waivers for localities short on jobs end. A waiver now requires unemployment above 10%.

WHAT IT MEANS

- Anyone not exempt must document 80 hours a month of qualifying work, education, volunteering or training.
- Most participants are still exempt. About 5,800 of current SNAP recipients are at risk of losing benefits. That's 0.7% of the state's total SNAP population which is around 750,000.
- SNAP referrals begin this fall with a 5-locality pilot. Medicaid customers join on January 1, 2027.

What counts is the same short list in both programs: work, education, volunteering, and work training. Everything under WIOA Title I counts in both.

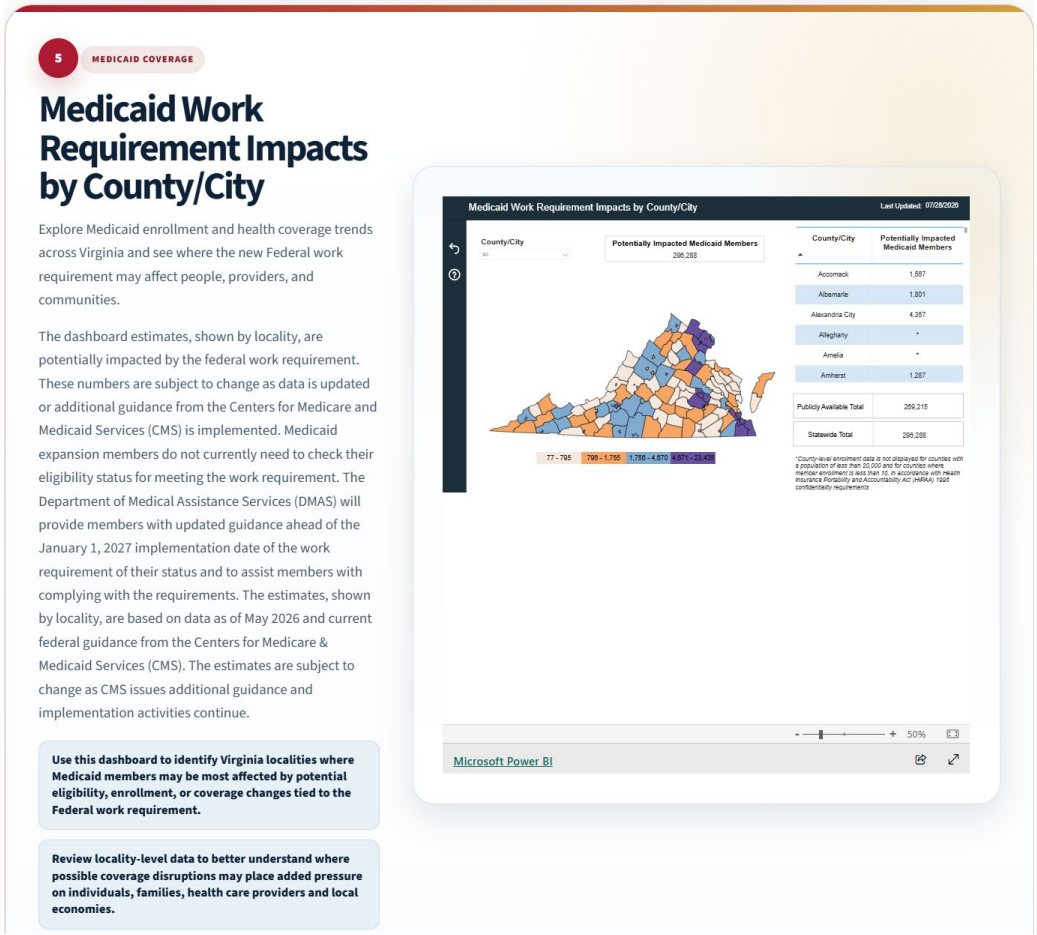
Two programs, two timelines, one referral process..

Why This Matters: Impact in Virginia

- The Secretary of Health and Human Resources has published dashboards estimating where Virginians may be most affected.
- Of the 550,000 Virginians with Medicaid expansion, as many as 300,000 may be at risk.

Table: Potential Impacts in Virginia Communities

Locality	Medicaid Expansion Enrollment (approx.)
Chesapeake City	14,000
Hampton City	12,000
Isle of Wight County	2,000
James City County	3,500
Newport News City	17,000
Norfolk City	23,000
Poquoson City	<1,000
Portsmouth City	11,000
Southampton County	2,000
Suffolk City	6,000
Surry County	<1,000
Virginia Beach City	25,000
Williamsburg City	<1,000
York County	3,000



Visit these dashboards online:
https://www.hhr.virginia.gov/hhr-dashboard

Ask. Refer. Support.

How a referral under the work requirement is meant to move, whichever door the person came through

ASK

What does this person need?

- 10 questions, asked at application and renewal, and by the call center.
- Questions 1 to 5 surface barriers. Questions 6 to 10 decide who to refer to.
- Optional, and with no effect on benefit eligibility.

REFER

How does the connection get made?

- **A. Automated**. The state pushes the record to Virginia Works.
- **B. Self-directed.** The person is given the door and walks through it themselves.
- **C. Local.** Partner to partner, on the ground. Not defined yet.

This is today's focus!

SUPPORT

What happens after the handoff?

- Each receiving agency runs its own intake and its own service model.
- Virginia Works Wagner-Peyser staff hold weekly orientations
- Employment and workforce services get delivered locally and through technology

UNDERNEATH ALL THREE: TROUBLESHOOTING

- Stuck on the questions: the Citizen Services Call Center first, then local DSS for anything case-specific.
- Stuck on a referral or a service: the agency involved, or local DSS for anything tied to the case.

Ask: how we find out where to send someone

The same 10 questions, whichever door the person came through

ASKED AT | **Initial application or renewal** | **Citizen Services Call Center** | **SNAP interview** | **TONI**

QUESTIONS 1 TO 5 — Barrier removal	QUESTIONS 6 TO 10 — Who to refer the person to
1. Comfortable using computers and devices	6. Help finding or preparing for a job > Virginia Works
2. Access to a device and the internet	7. English, a diploma, college prep > Adult Education
3. English language help or an interpreter	8. Training at the community colleges > VCCS Fast Forward
4. A safe and stable place to live	9. Volunteering to meet the requirement > Serve Virginia
5. Utilities shut off, or about to be	10. A disabling condition, wants to work > DARS
Answers route to TONI, 211 Virginia and to Lifeline Support.	*For now, only question 6 will produce an automated referral.*

The questions are optional, are repeated for each adult age 18 to 64, and have no bearing on whether someone is found eligible for benefits.

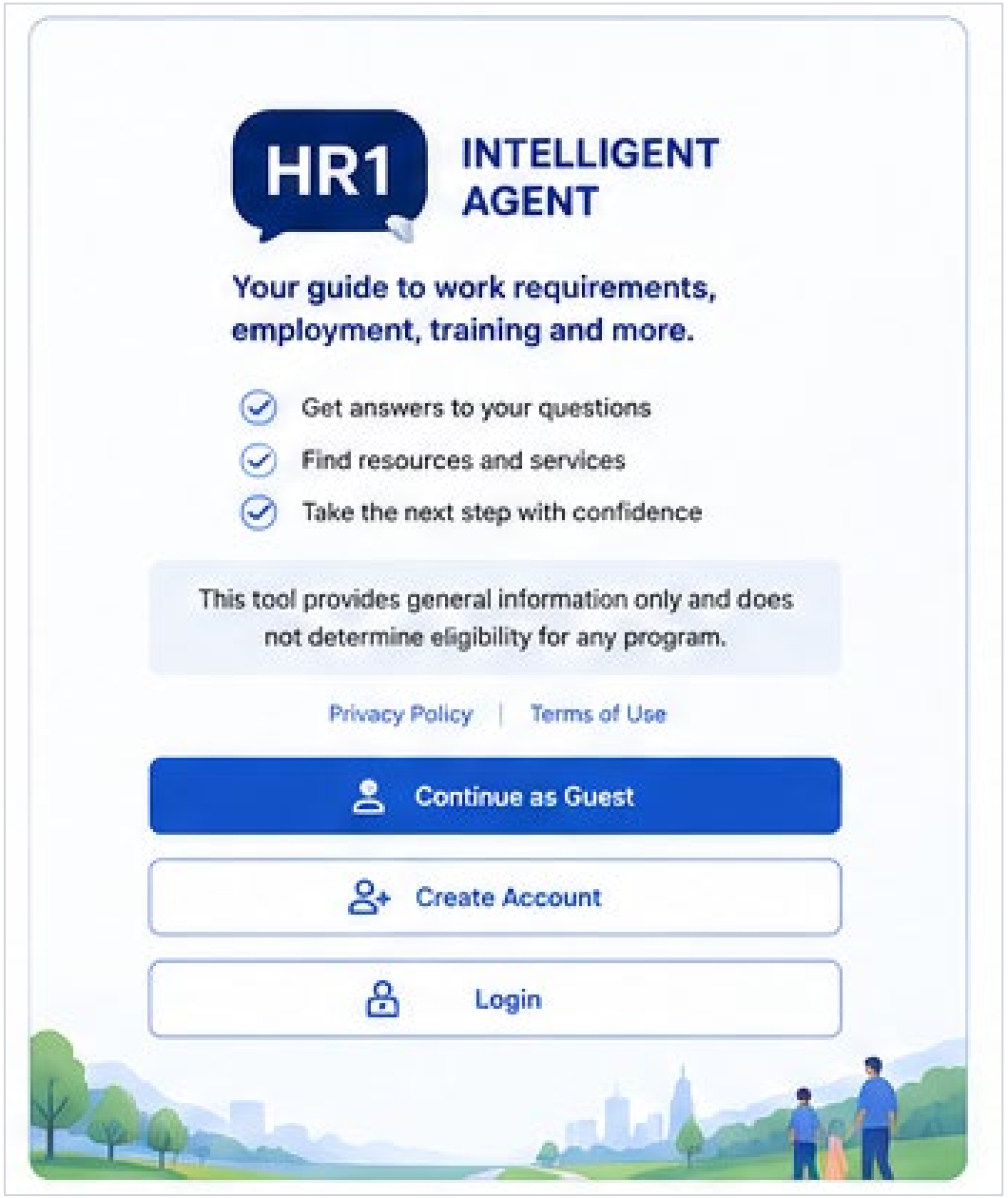
Meet TONI

Tools, Outreach, Navigation and Insight

VDSS' new intelligent agent for the HR1 work requirement.

- A guide customers can talk with 24/7, in plain language
- Answers questions about the rules, clearly and kindly
- Coaches each customer toward a real plan to meet the requirement
- Connects people to training, volunteering, and help with barriers
- **Piloting this fall. Live for January**

** NOTE: While TONI will advise on the rules and policy surrounding work requirements, it will never make predictions or determination about someone's benefits.*



Working design of TONI's welcome screen, August 2026

Refer: three ways the connection gets made

One is automated. One is on the person. One is on all of us, locally.

A

Automated and proactive

A yes to question 6 sends the record out of VaCMS through the Workforce Data Trust to Virginia Works, which reaches out to the person directly. Wagner-Peyser staff pick it up from there. This is the only question that produces an outbound referral. Every other pathway needs the person to act first.

B

Self-directed

After the application, the CommonHelp application portal will share referral links and provide customers with a downloadable resource PDF with information on where to go to get support

C

Local referral infrastructure

UNDEFINED

Referrals that happen on the ground, partner to partner, when the first place someone lands is not the right place. Local DSS offices send people on. So do AJCs. None of it runs through the Data Trust.

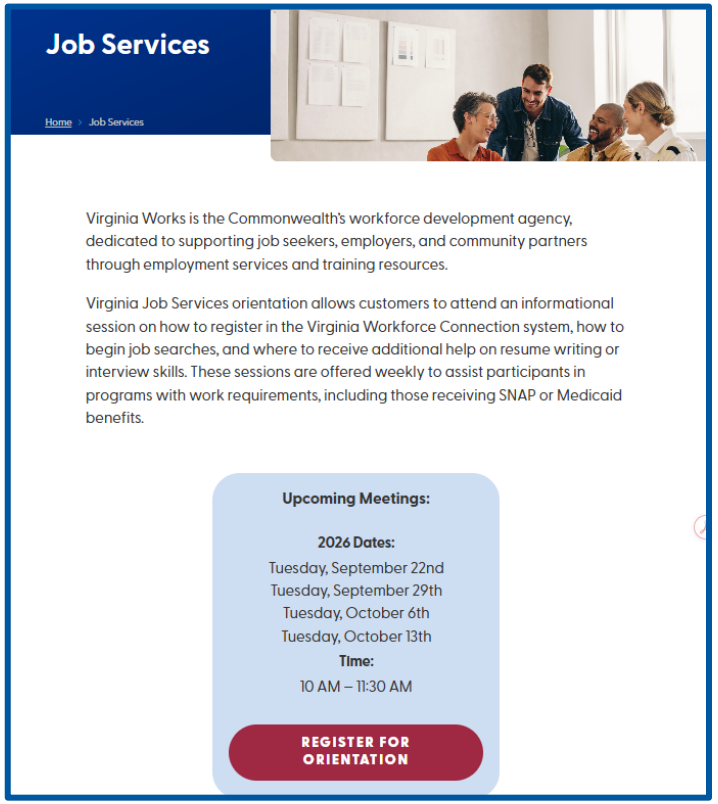
The automated referral, and the pilot running right now

Manual this month. Out of VaCMS automatically later in 2026.

RUNNING NOW: THE SNAP PILOT

- Pilot agencies identify people subject to the SNAP work requirement at application, renewal and recertification.
- A file of those participants is sent to Virginia Works, covering 4 of the 5 regions it serves.
- Virginia Works emails everyone with a valid address: an orientation invitation and a link to the HR.1 landing page.
- Weekly virtual orientation sessions start this week, and run every week from here on.
- At orientation people register in VAWC and are invited to schedule with a career navigator in their area.

www.virginiaworks.gov/job-services



What reaches the local level is the person's name and contact information. The answers to the 10 referral questions are filtered out in the case file transfer through the Data Trust. If you want to know what someone needs, you will have to ask them.

SNAP Workforce Referral Pilot

Partner Expectations

Local Department of Social Services Responsibilities (Fairfax County, Henrico County, Suffolk County, Roanoke City, Washington County, Amelia, Norfolk, Charlottesville, Galax and Radford)

The Pilot Agencies will:

- The pilot agencies identify individuals who are subject to applicable SNAP work requirements during application, reapplication, recertification and when changes are reported. (normal eligibility process now)
- Fairfax SNAP E&T program will serve customers approved for time limited SNAP benefits (Y1s/Y2s/E9s).
- Serve as the primary contact for policy and eligibility questions, like normal.
- Update applications/cases accordingly when work requirements are met based on activities performed that meet work requirements.

SNAP Workforce Referral Pilot

Partner Expectations and Best Practices

Local Department of Social Services Responsibilities:

- Make sure the customer's preferred method of contact is recorded and that the corresponding contact information is accurately documented. For example, if the preferred contact method is email, confirm that the email address is entered.
- During the SNAP interview, if the customer appears to be subject to ABAWDS requirements, ensure they understand that by consenting to data sharing, they may be contacted by VA Works for workforce support services that can help with their education, training, or employment needs, which may assist them in meeting SNAP work requirements.
- If the local agency is contacted by a customer who received correspondence from VA Works, explain that VA Works is a partner with DSS and provides services to help customers meet their education, training, or employment needs, which may assist them in meeting SNAP work requirements. Also clarify that participation in these services is entirely voluntary.
- Benefits staff in SNAP E&T agencies are responsible for explaining the SNAP E&T program, encouraging voluntary participation, and making referrals for individuals who choose to enroll. These referrals connect participants with workforce services that can support their education, training, or employment needs and may help them meet SNAP work requirements.

Support: The Pilot and Beyond

What happens once a referral reaches Virginia Works (Wagner-Peyser). The pilot tests each step by hand; the sustainable model automates intake.

PILOT 1 month, 5 SNAP pilot localities

Milestones

- **9/8** First file sent
- **9/14** Landing page live
- **9/22** First orientation

1. **Data transfer**
   DSS sends 1 referral file every Monday through a local file
2. **Outreach**
   Virginia Works contacts each customer by email and text (telephone as needed)
3. **90 minute Orientation - 4 Parts (3 =entrance into ecosystem and 4th Regional specific)**
   Weekly, virtual; Tech Bridge helps people without a computer join
   — Tech Bridge
4. **Self-registration**
   Customer completes registration with Virginia Works
5. **45-60-minute intake**
   Wagner-Peyser staff offer career support and enroll the customer
   — WP enrollment
6. **Referred on**
   Staff refer to the right next service
   — Career.io | WIOA Title I | Title III

SUSTAINABLE MODEL statewide, after the pilot

Direct routes to orientation

- CommonHelp
- Local DSS offices and notices
- TONI

1. **Auto-registration**
   Customer is registered automatically through the Data Trust
2. **Automated outreach**
   Email invitation goes out with no staff action
3. **Orientation**
   Open to every referral, plus anyone arriving by a direct route
4. **Next step matched to need**

Self-help
- YouTube videos
- Career.io
- Virginia Job Club

45-60-minute intake as needed
One-on-one with Wagner-Peyser staff, who can refer on

In-person workshop
Group sessions for customers who want more support

Current State and Needs Assessment

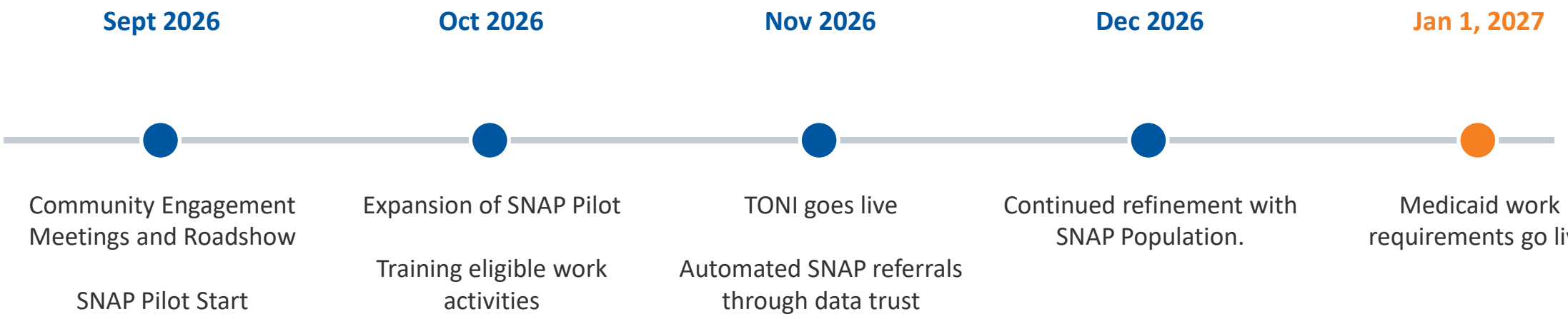
Where things stand for the people we are all already serving

1. What happens today when someone walks into a LDSS and says their benefits are at risk?

2. How do clients experience the handoffs between DSS, and local partners today?

3. What are the biggest challenges we currently see among at-risk SNAP and Medicaid recipients related to employment, stability, or program engagement?

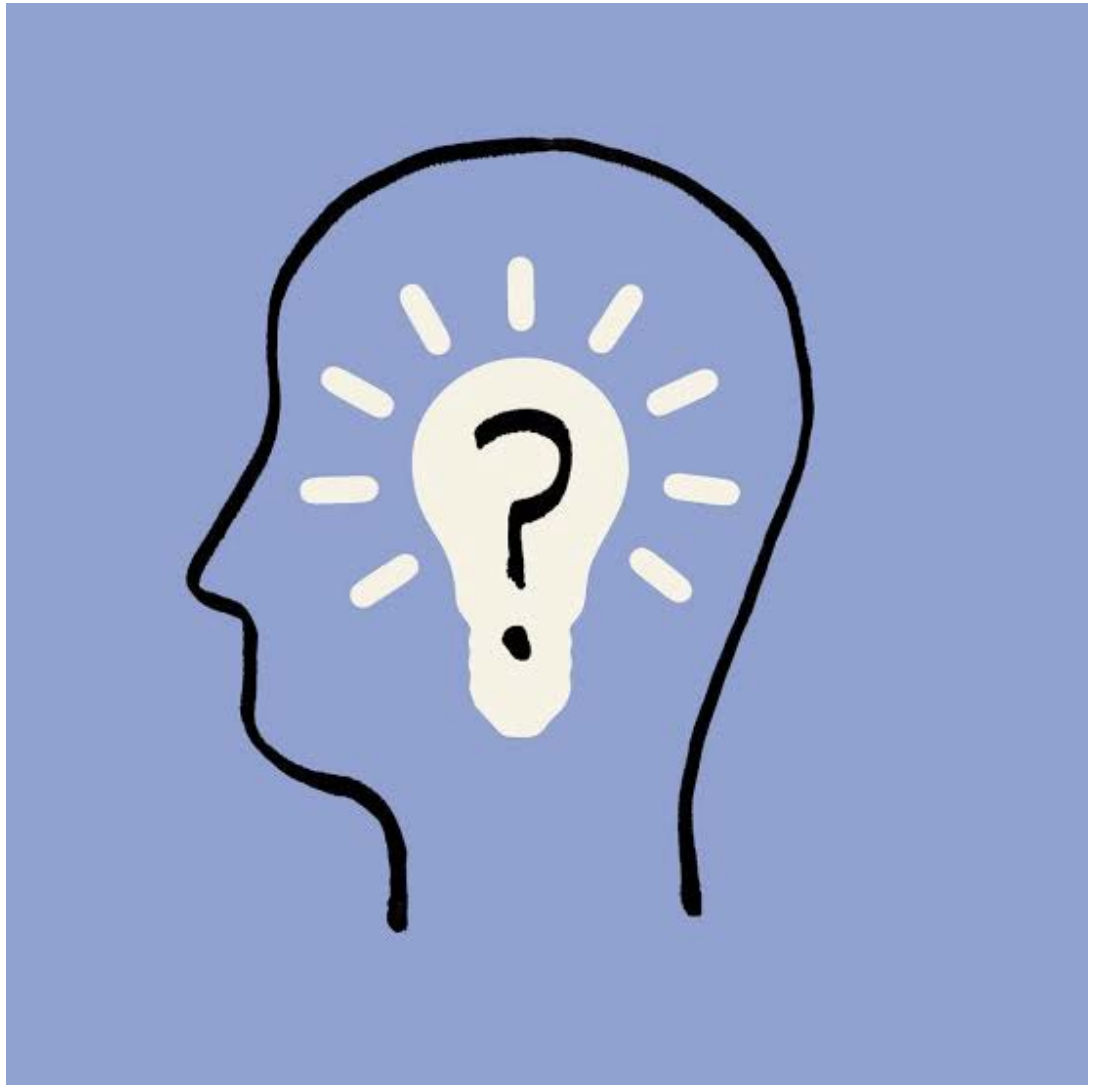
Next Steps



And that's just Phase 1.

All of Phase 1 is about helping as many people as possible get to services as quickly as possible. Phase 2 involves automating verifications of eligible work and community engagement activities so that fewer customers have to rely on manual proof. We also plan to leverage technology (TONI and a Medicaid work portal) to help customers upload verification documents and track their progress towards work requirements.

Questions????



Thank You