



The Tapestry of Time

**THE SNAP WORK
REQUIREMENT
CLOCK**

BPRO Fall Conference 2025

A stack of four knitted socks in various colors (grey, brown, orange, and white) is shown on the left side of the image. A ball of brown yarn is visible in the foreground. The background is a soft, out-of-focus white fabric. The word "WELCOME" is written in large, white, bold, sans-serif capital letters across the middle of the stack of socks.

WELCOME

The Work Requirement clock is our method of tracking SNAP participation to ensure compliance with guidance at Part 15 of the SNAP manual. The clock weaves together the story of a SNAP recipient's past and present, each thread contributing to the complex pattern that determines the future.

With even more changes upcoming for the Work Requirement, it is important to understand the foundations of guidance that drive how it works. Join us as we unravel guidance on countable months, VaCMS exemption codes, and how to use the clock to determine the correct action to take on SNAP applications and ongoing cases.

AGENDA

- Purpose of the Work Requirement clock
- Time limits & disqualified individuals
- Reviewing existing clocks
- Clock coding
- Using the clock to determine case actions
- What's new for the Work Requirement

PURPOSE OF THE WORK REQUIREMENT CLOCK

PURPOSE OF THE CLOCK

The Work Requirement Clock is a method of tracking SNAP participation to ensure compliance with guidance at **Part 15:**

*Unless an exemption to the work requirement exists, individuals may receive SNAP benefits for only **three months** during a 36-month period.*

*Nonexempt...individuals who regain eligibility through work activities are eligible for a maximum of **three months** of regained benefits if they are no longer working or involved in a work activity.*

WHO AND WHAT IS TRACKED?

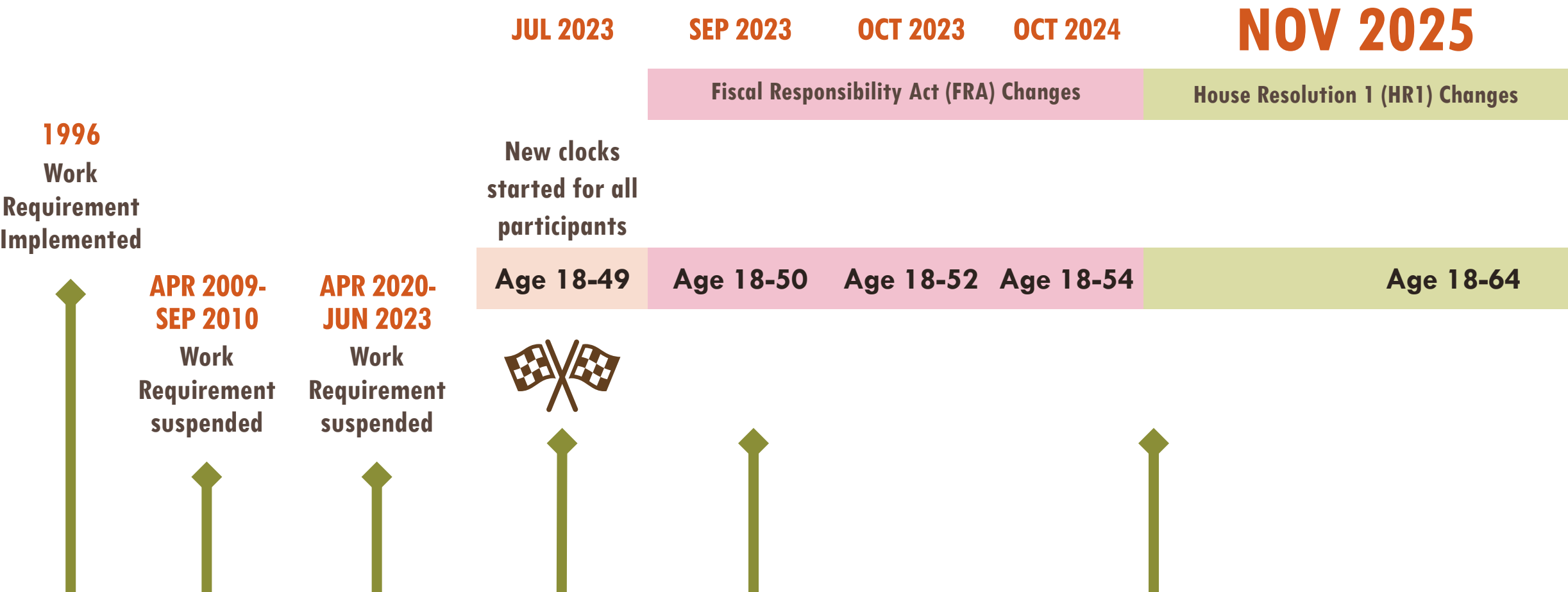
Nonexempt
individuals age
18-65*

The clock is a fixed 36-month period that begins the first month a case is certified in Virginia for any household member in the age range.

The clock stays in place and each month will be assigned a code, even when the individual is:

- Not receiving benefits
- Exempt
- Meeting the provisions of the Work Requirement

HISTORY OF THE WORK REQUIREMENT — WHO HAS A CLOCK?



We will discuss more about the upcoming changes soon...it takes patience to learn the basics!

TIME LIMITS AND DISQUALIFIED INDIVIDUALS

MEETING THE WORK REQUIREMENT

To receive SNAP benefits beyond three months, a nonexempt able-bodied household member must:

- Work for cash wages in any amount or for in-kind goods or services for 20 hours or more per week, averaged monthly;
- Participate in and comply with requirements of an employment services program operated by DSS other than job search, for 20 hours or more per week or for the number of hours assigned for the work experience component as calculated by the household's allotment divided by the federal minimum wage;
- Participate in and comply with non-departmental (VDSS) work programs for 20 hours or more per week;
- Serve in an unpaid, volunteer capacity for a public or private agency, at a minimum, for the number of hours that is equal to the household's allotment divided by the federal minimum wage; or
- Any combination of these activities. **Part 15.A**



EXEMPT FROM THE WORK REQUIREMENT

The BPS must:

- Assess each individual for exemption from time-limited benefits
- Assess fitness for employment at certification or recertification
- Document that the household was informed of the exemptions or how to comply
- Documentation may include that the SNAP Time-Limited Benefit flyer was provided
- Establish the 36-month period and track the reasons for the exemption for everyone who meets an exemption other than age

Type	Exemption
WORK REGISTRATION	Individual's age is <16 or >60 or Age 16 &17 Not Head of HH
	Enrolled at least 1/2 time in recognized school or training (not E&T placements)
	Caretaker of Child Under 6
	Caretaker for Disabled Individual
	Unemployment or Employed
	Disability Exemption
	Drug or alcohol treatment program
	Enrolled in VIEW
WORK REQUIREMENT	Child < 14 in HH
	Working at least 20hrs/week
	Chronically homeless
	Mentally or Physically Unfit to work
	Pregnant
	Locality Waived from Requirement
	Under Age 18 and 65 or older
	Due to Tribal Affiliation

DISQUALIFIED INDIVIDUALS

If the individual is neither exempt nor meeting the Work Requirement, they will be limited in the amount of time they can receive SNAP benefits.

Once this time has been exhausted, the individual will be disqualified from receiving SNAP for the remainder of the 36-month period, unless their situation changes.

Ongoing households with members who are not eligible because of the work requirement must continue to report changes involving these members.

*Unless an exemption to the work requirement exists, individuals may receive SNAP benefits for only **three months** during a 36-month period.*

*Nonexempt...individuals who regain eligibility through work activities are eligible for a maximum of **three months** of regained benefits if they are no longer working or involved in a work activity.*

DISQUALIFIED INDIVIDUALS — RESOURCES, INCOME AND DEDUCTIONS

When participating with other household members, individuals who are disqualified from receiving SNAP because of the Work Requirement provisions will have their income and deductions **prorated**.

Do not include the disqualified individual to assess the resource eligibility limit, the income eligibility limit, benefit level, or to assign the standard deduction.

Resources

For non-categorically eligible households

Resources of disqualified individuals count in full to the remaining household members.

Income

Prorate the income of the disqualified individual. Subtract allowable exclusions. Divide the income evenly among all household members, including the disqualified individual. Count all but the disqualified individual's portion.

Deductions

Assess who is responsible for an expense or who pays an expense. Divide the expenses of the disqualified individual evenly among all household members, including the disqualified individual. Count all but the disqualified individual's portion except allow the utility standard in full for households entitled to the utility standard regardless of who pays heating or cooling expenses.

If an eligible household member is responsible for an expense or pays the expense, allow the household the entire expense even if the disqualified individual is also responsible for the expense.

REVIEWING EXISTING CLOCKS

Reviewing existing clocks is essential to ensure case accuracy. One of our most common errors that contributes to the **Payment Error Rate (PER)** is related to SNAP household composition.

Errors of this type affect all areas of the SNAP case, including household size and the amount of income and deductions allowed towards the SNAP household, which affect the payment amount.

EXISTING CLOCKS

- The clocks for individuals that exist today may begin as early as **July 2023**.
- This is the month that all remaining post-pandemic exemptions ended and new clocks were created for all SNAP recipients who were in the age range at that time.
- Other individuals may have later clock begin dates, depending on when they were initially certified after July 2023.

36-month fixed period					
JUL 2023	AUG 2023	SEP 2023	OCT 2023	NOV 2023	DEC 2023
JAN 2024	FEB 2024	MAR 2024	APR 2024	MAY 2024	JUN 2024
JUL 2024	AUG 2024	SEP 2024	OCT 2024	NOV 2024	DEC 2024
JAN 2025	FEB 2025	MAR 2025	APR 2025	MAY 2025	JUN 2025
JUL 2025	AUG 2025	SEP 2025	OCT 2025	NOV 2025	DEC 2025
JAN 2026	FEB 2026	MAR 2026	APR 2026	MAY 2026	JUN 2026

CLOCK CODING

TYPES OF CODES

Countable months



YI

Months that the individual used time-limited benefits

Exemption codes



Months the individual was exempt from the work requirement

Other tracking codes



+

Months that indicate additional circumstances

1 COUNTABLE MONTHS


Unless an exemption to the work requirement exists, individuals may receive SNAP benefits for only **three months** during a 36-month period.

Nonexempt...individuals who regain eligibility through work activities are eligible for a maximum of **three months** of regained benefits if they are no longer working or involved in a work activity.

COUNTABLE MONTHS

The three-month limitations on initial and regained benefits refer to **countable months**.

Y1 **Y2**



This means that there can never be more than **three Y1 months** and **three Y2 months** on an individual's current 36-month Work Requirement clock.

COUNTABLE MONTHS

A **countable month** is any month that a nonexempt individual age 18-64* receives the full benefit month as part of a certified SNAP household.

Countable months do not apply to:

- A month the household receives prorated benefits or a zero allotment due to benefits < \$10
- A month a household is authorized for benefits but does not participate
- A month in which benefits were received in error, when the household has fully repaid the claim



*NEW GUIDANCE EFFECTIVE 11/1/2025

HOW DOES THE CLOCK TRACK COUNTABLE MONTHS?

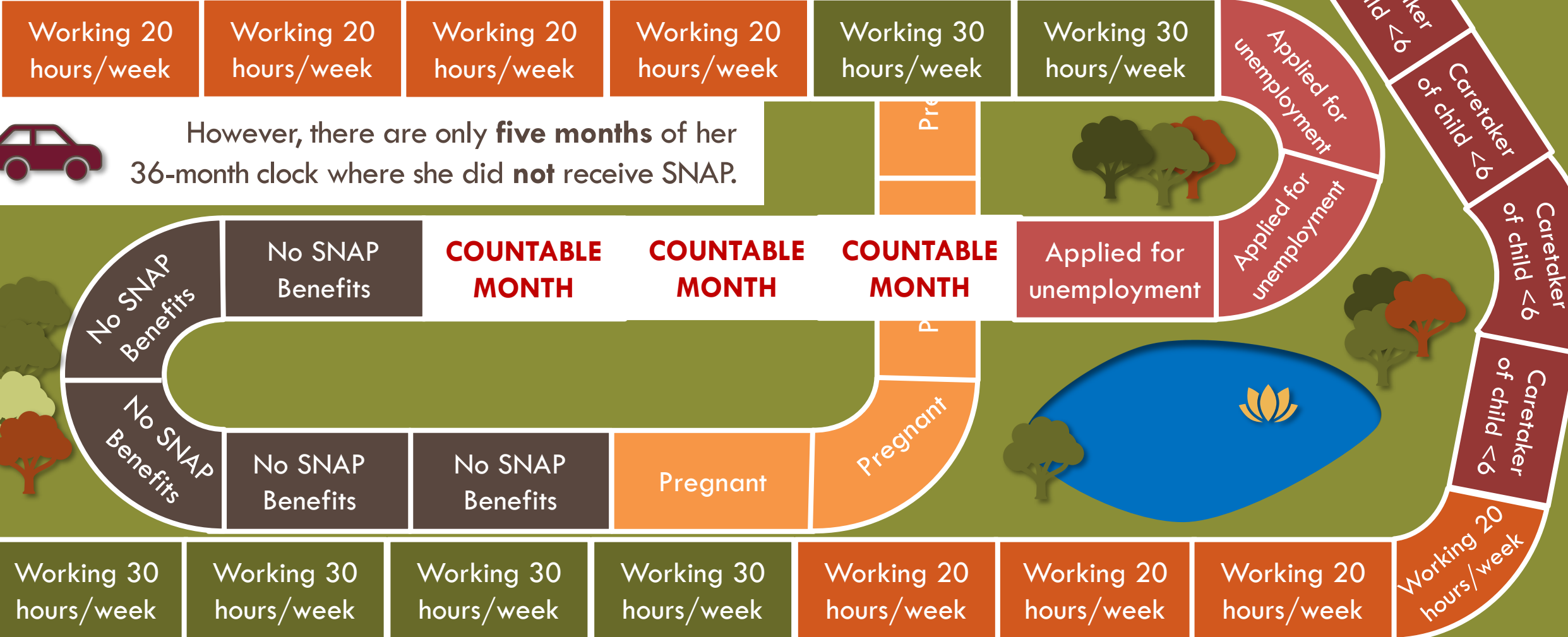
In order to determine the number of countable months of SNAP an individual has received over the 36-month period, we must track **all** months that the individual receives SNAP benefits.

The customer may still be eligible for SNAP without using countable months if they are **exempt from** or **meeting** the work requirement.

36-month fixed period					
JUL 2023	AUG 2023	SEP 2023	OCT 2023	NOV 2023	DEC 2023
JAN 2024	FEB 2024	MAR 2024	APR 2024	MAY 2024	JUN 2024
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JUL 2025	AUG 2025	SEP 2025	OCT 2025	NOV 2025	DEC 2025
JAN 2026	FEB 2026	MAR 2026	APR 2026	MAY 2026	JUN 2026

EXAMPLE: TRACKING MONTHS

Florence has had a number of changes in her circumstances since her clock began.



However, there are only **five months** of her 36-month clock where she did **not** receive SNAP.



Part of the tracking process is the assignment of the proper code to identify the individual's situation **each month** of the 36-month period.



E1	E1	E1	E1	E6	E6
E6	E6	E6	Y1	Y1	Y1
NB	NB	NB	NB	NB	E4
E4	E4	E4	E4	E4	E4
E6	E6	E6	E6	E6	E6
E6	E6	E6	E6	E6	E6
Months the individual received SNAP					

The use of codes is helpful because it gives us a way to easily identify these changing circumstances.

The assignment of codes is a methodical process that mirrors SNAP Guidance at **Part 8** and **Part 15**.

2

EXEMPTION CODES

SCREENING FOR EXEMPTIONS

Individuals in the age range must be screened at application/reapplication, recertification, and when changes are reported that impact the individuals' exemption status. Screening is based on guidance in **Part 8** and **Part 15** of the SNAP manual.

The BPS needs to be familiar with guidance in these chapters to ensure that an exemption is applied when it is appropriate.

Chapter 8.A.1: Exemption from Work Registration

First, determine if SNAP household member from age 16-59 meets a work registration exemption. Individuals that are not exempt will be registered for work, i.e. referred to SNAP Employment and Training.

Chapter 15: Work Requirement

If an individual is exempt from Work Registration **for any reason other than age***, the individual will also be exempt from Work Requirement. Individuals age 18-64 must be evaluated for Work Requirement exemptions.

HOW SCREENING FOR EXEMPTIONS WORKS

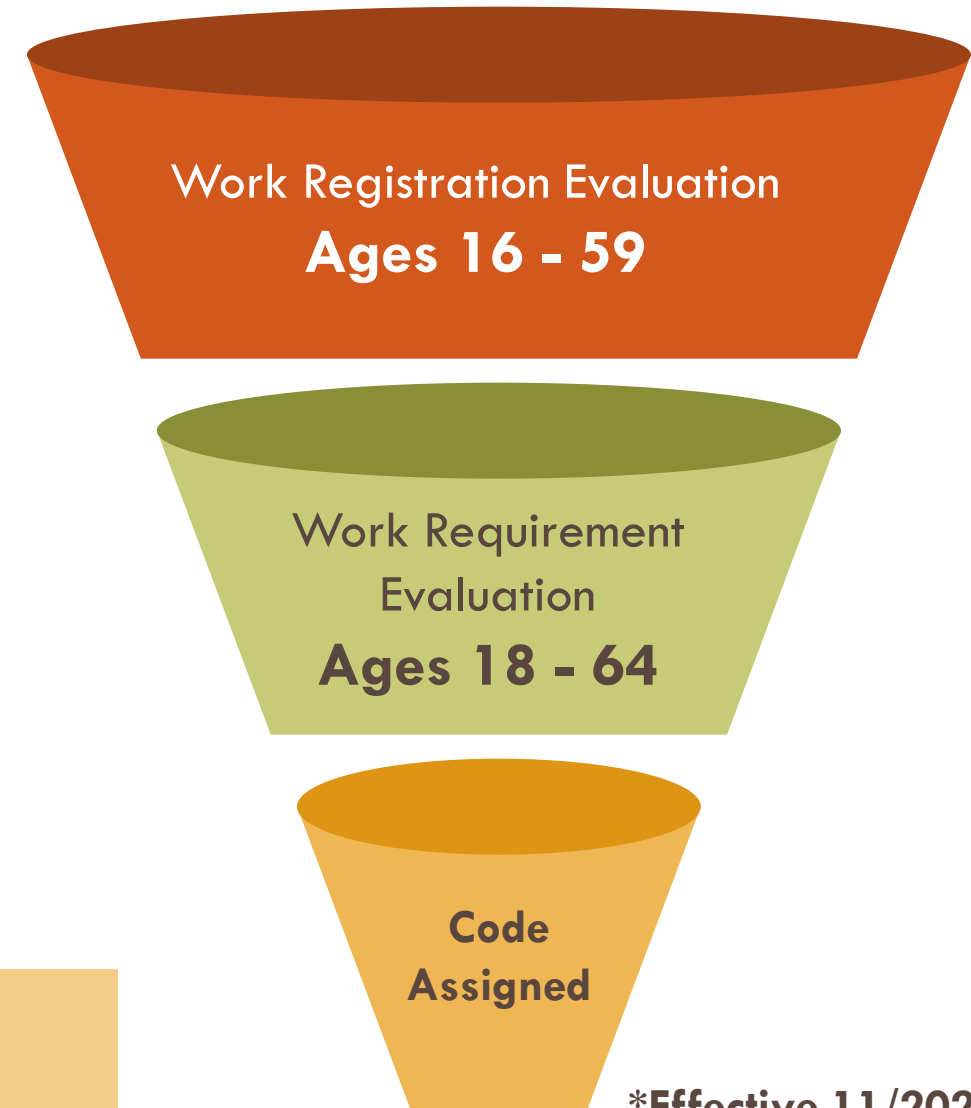
Chapter 8.A.1: Exemption from Work Registration

First, determine if SNAP household member from age 16-59 meets a work registration exemption. If an individual is exempt from Work Registration **for any reason excluding age***, the individual will also be exempt from Work Requirement.

Chapter 15: Work Requirement

Individuals that are not exempt from Work Registration, **and individuals who are only exempt from Work Registration because they are age 60 or over** must be evaluated for Work Requirement exemptions.

Whenever eligibility is run or a batch is issued, VaCMS will apply the exemption rules based on this guidance.



***Effective 11/2025**

Type	Exemption	Exemption Code & Description	VaCMS Entry
WORK REGISTRATION	Individual's age is <16 or >60 or Age 16 &17 Not Head of HH	E6 - Exempt from Work Registration	Client DOB SNAP/TANF Case Level Details
	Enrolled at least ½ time in recognized school or training (not E&T placements)	E6 - Exempt from Work Registration	Education
	Caretaker of Child Under 6	E6 - Exempt from Work Registration	SNAP Work Requirements
	Caretaker for Disabled Individual	E6 - Exempt from Work Registration	SNAP Work Requirements
	Unemployment or Employed 30 hrs/week	E6 - Exempt from Work Registration	SNAP Work Requirements
	Disability Exemption	E6 - Exempt from Work Registration	Disability Details
	Drug or alcohol treatment program	E6 - Exempt from Work Registration	SNAP Work Requirements
	Enrolled in VIEW	E2 - Active in an approved work program	Program Request – APR Signed
Individuals not exempt from Work Registration AND individuals who are only exempt from Work Registration because they are age 60 or over are now screened for Work Requirement exemptions below.			
WORK REQUIREMENT	Child under 14 in HH	E3 - Caring for a dependent child under 14	Automatic based on HH comp
	Working at least 20hrs/week	E1 - Working at least 20hrs/week	SNAP Work Requirements
	Chronically homeless	EH - Chronically homeless	Disability Details
	Mentally or Physically Unfit to work	E5 - Medically Certified as unable to work	Disability details
	Pregnant	E4 - Pregnant	Pregnancy Details
	Locality Waived from Requirement	E7 - Locality Waived from Requirement	Automatic based on FIPS
	Under Age 18 and 65 or older	E8 - Under Age 18 and 65 or older	Client DOB
	Certain Indigenous Persons	EA – Due to Tribal Affiliation	Client Information

Code	Description	
WORK REGISTRATION	E6	Age <16 or >60 or Age 16 &17 not head of HH
	E6	Enrolled at least 1/2 time in recognized school or training
	E6	Caretaker of Child Under 6
	E6	Caretaker for Disabled Individual
	E6	Unemployment or Employed
	E6	Disability Exemption
	E6	In a drug or alcohol treatment program
	E2	Enrolled in VIEW
WORK REQUIREMENT	E3	Child <14 in SNAP Household
	E1	Working at least 20hrs/week
	EH	Chronically homeless
	E5	Medically Certified as unable to work
	E4	Pregnant
	E7	Locality Waived from Requirement
	E8	Under age 18 and 65 and older
	EA	Due to Tribal Affiliation

EXAMPLE: WORK REQUIREMENT EVALUATION

Mark lives with two roommates. He works 25 hours a week and attends community college half-time.

Mark will be assigned the Work Registration exemption **E6 – Exempt from Work Registration** because this code falls higher in the logic order for evaluation than the Work Requirement exemption **E1 – working at least 20 hrs/week.**

EXAMPLE: WORK REQUIREMENT EVALUATION IN VACMS

- The BPS indicates the information under **Education Details** to allow for the appropriate exemption.
- Do not change an exemption code to another exemption code as long as it is valid for the individual and all data has been entered.
- When the batch runs to issue his benefits each month, the **E6** code will populate on Mark's clock.

Current Education Details

School Name: Mountain Community College

Type of Educational Institution: Community College or Junior College ▾

* Enrollment Status: Half-time ▾

As of the Application Date has the Child Started Kindergarten? ▾

Anticipated graduation date: mm / dd / yyyy 📅

Is the individual physically, mentally or emotionally unprepared to attend school? ▾

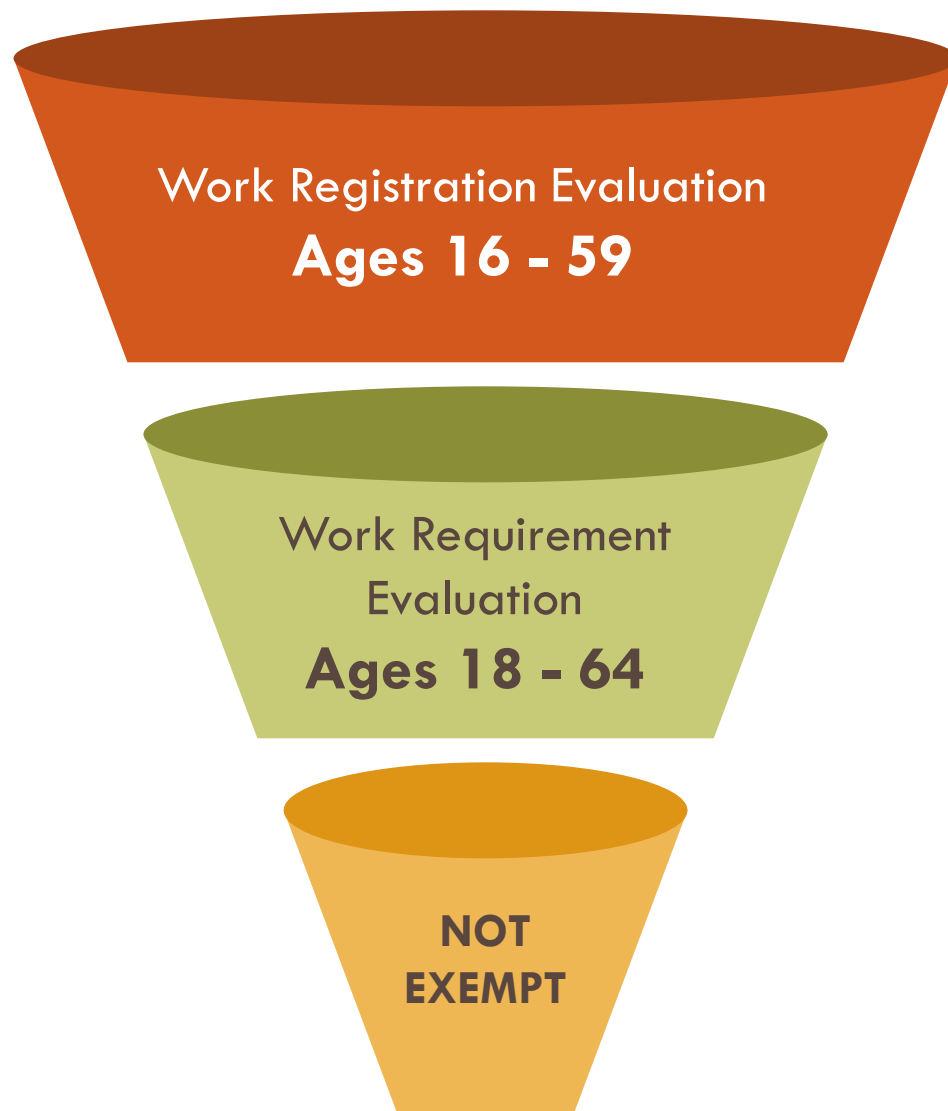
Student works at least 80 hours per month: YES ▾

Mark is an eligible student because he works 80 hours/month. He is exempt from **Work Registration** (Enrolled at least ½ time in an institution of higher education.)

LET'S REVISIT TIME LIMITS

After evaluation for both Work Registration and Work Requirement, if no exemption exists, the individual will be subject to time-limited benefits.

This is when the individual will need to start using their **countable months** to receive SNAP benefits.



3

OTHER TRACKING CODES

WHAT ARE THE OTHER CODES USED FOR?

In addition to the exemption codes, other situations are recorded on the clock for tracking purposes. Some are automatically determined by VaCMS, while others may be manually entered to indicate special circumstances.

Code	Description	Use
Y1	Not Exempt 1st set of 3 months	<ul style="list-style-type: none"> Countable month (first set of 3 months) Assigned automatically at EDBC
Y2	Not Exempt 2nd set of 3 months	<ul style="list-style-type: none"> Countable month (2nd set of 3 months) Assigned automatically at EDBC
PM	Prorated Month	<ul style="list-style-type: none"> Used for initial certification month when countable months are being utilized Assigned automatically at EDBC
LE	Lost Exemption	<ul style="list-style-type: none"> Used to indicate an individual has lost their exemption and failed to report; evaluate for possible over-issuance Requires a retroactive assessment Manually entered by BPS
E9	Special exemption to allow certification up to 6 months	<ul style="list-style-type: none"> Discretionary month used by Virginia to extend certification periods to 6 months Assigned automatically in months subsequent to certification month when countable months are being utilized Does not apply when an individual's status changes during an established certification period
NB	No benefits received	<ul style="list-style-type: none"> Used after reapplication to indicate past months benefits were not received Manually entered by BPS upon reapplication

EXAMPLE: USING OTHER TRACKING CODES

When an individual will be using countable months at initial certification or recertification, the **E9** tracking code is used to establish a 6-month certification period.

Certification Guidance, Part 4:

Households in which any member is eligible for time-limited benefits through the work requirement may receive benefits for no more than 6 months, using a combination of:

- *Prorated months (**PM**)*
- *Countable months (**Y1** or **Y2**), and*
- *Special exemption (**E9**) months*

EXAMPLE: USING OTHER TRACKING CODES

Caretaker of child under 6	Caretaker of child under 6	Caretaker of child under 6	Caretaker of child under 6	Caretaker of child under 6	Caretaker of child under 6
Caretaker of child under 6	Caretaker of child under 6	Caretaker of child under 6	Caretaker of child under 6	Caretaker of child under 6	Caretaker of child under 6
Caretaker of child under 6	NO SNAP BENEFITS	NO SNAP BENEFITS	NO SNAP BENEFITS	NO SNAP BENEFITS	NO SNAP BENEFITS
Prorated month	COUNTABLE MONTH	COUNTABLE MONTH	COUNTABLE MONTH	SPECIAL EXEMPTION	SPECIAL EXEMPTION

Special Exemption (E9) months are added to allow for a six-month certification. E9 months do not apply when an individual's status changes during an established certification period.

Months the individual received SNAP

Application month, received SNAP

NO SNAP BENEFITS = NB

COUNTABLE MONTH = YI

SPECIAL EXEMPTION = E9

Luis asked for his case to close several months ago when his child left the home. He has now reapplied and is not working or meeting an exemption.

Because the special exemption (**E9**) code is being used at application in conjunction with the countable (**Y1**) months, the recipient is able to receive a six-month certification period. These months will populate **automatically** by VaCMS each month.



E6	E6	E6	E6	E6	E6
E6	E6	E6	E6	E6	E6
E6	NB	NB	NB	NB	NB
PM	Y1	Y1	Y1	E9	E9

Special Exemption (E9) months are added to allow for a six-month certification.

The BPS **manually** updated the months that Luis did not receive benefits with the **NB** code.

His case will need to be reevaluated at recertification to determine if he will still be eligible.

USING THE CLOCK TO DETERMINE CASE ACTIONS

Always review the clock at application/reapplication, recertification, and when changes are reported that affect the individual's status.



E1	E1	E1	E1	E6	E6
E6	E6	E6	Y1	Y1	Y1
NB	NB	NB	NB	NB	

After existing clocks have been reviewed for accuracy, you will need to determine what action to take when one of these actions takes place.

INITIAL CERTIFICATION

- At application
- No countable months previously used on the current 36-month clock
- Individual not exempt

You just saw an example of a household that was certified for 6 months, using a combination of a prorated month, countable months, and special exemption months.

PM	Y1	Y1	Y1	E9	E9
----	----	----	----	----	----

However, household circumstances can change frequently, so it is rarely as simple as certifying a SNAP case and awaiting interim report or recertification.

Let's look at how to evaluate ongoing cases.

BEYOND THE APPLICATION

The **Work Requirement Evaluation Guide** on Fusion was developed to help determine what should happen on a case when taking any action, depending on the customer's circumstances at that time.

This tool indicates what action you should take when performing the following actions on a case:

- Application/Reapplication/Recertification
- Change/Interim Report

Action being taken	Individual Exempt or meeting Work Requirement?	Status of current 36-month clock				
		Y1 Months Remaining	Y1 Months exhausted	Y1 Months exhausted but eligibility regained per 80/30 criteria in Part 15.C.2	Y1 and Y2 Months exhausted	Y1 and Y2 Months exhausted but eligibility regained AND maintained per Part 15.C.2
Application/Reapplication/Recertification	No	<ul style="list-style-type: none"> - Approve with remaining Y1 months - PM/E9 codes will populate automatically * 	<ul style="list-style-type: none"> - Deny individual or close case - Send NOA 	<ul style="list-style-type: none"> - Approve with Y2 months - PM/E9 codes will populate automatically* 	<ul style="list-style-type: none"> - Deny individual or close case - Send NOA 	N/A Individual not currently meeting Work Requirement (maintaining) or exempt
	Yes	<ul style="list-style-type: none"> - If all HH members are excluded or exempt, approve with standard certification period - Factor in known impending changes (e.g. age) when assigning certification period - No time-limited months will be used 				
Change/** Interim Report	No***	<ul style="list-style-type: none"> - Authorize with remaining Y1 months - Individual must be removed or case closed after Y1 months exhausted 	<ul style="list-style-type: none"> - Deny/remove individual or close case - Send ANPA (Changes) or NOA (Interim Reports) 	<ul style="list-style-type: none"> - Authorize with Y2 months - Individual must be removed or case closed after Y2 months exhausted 	<ul style="list-style-type: none"> - Remove individual or close case - Send ANPA (Changes) or NOA (Interim Reports) 	N/A Individual not currently meeting Work Requirement (maintaining) or exempt
	Yes	Authorize through remainder of cert period, no time-limited months will be used				

Action being taken	Individual Exempt or meeting Work Requirement?	Status of current 36-month clock				
		Y1 Months Remaining	Y1 Months exhausted	Y1 Months exhausted but eligibility regained per 80/30 criteria in Part 15.C.2	Y1 and Y2 Months exhausted	Y1 and Y2 Months exhausted but eligibility regained AND maintained per Part 15.C.2
Application/ Reapplication/ Recertification	No	<ul style="list-style-type: none"> – Approve with remaining Y1 months – PM/E9 codes will populate automatically * 	<ul style="list-style-type: none"> – Deny individual or close case – Send NOA 	<ul style="list-style-type: none"> – Approve with Y2 months – PM/E9 codes will populate automatically* 	<ul style="list-style-type: none"> – Deny individual or close case – Send NOA 	N/A Individual not currently meeting Work Requirement (maintaining) or exempt
	Yes	<ul style="list-style-type: none"> – If all HH members are excluded or exempt, approve with standard certification period – Factor in known impending changes (e.g. age) when assigning certification period – No time-limited months will be used 				
Change/** Interim Report	No***	<ul style="list-style-type: none"> – Authorize with remaining Y1 months – Individual must be removed or case closed after Y1 months exhausted 	<ul style="list-style-type: none"> – Deny/remove individual or close case – Send ANPA (Changes) or NOA (Interim Reports) 	<ul style="list-style-type: none"> – Authorize with Y2 months – Individual must be removed or case closed after Y2 months exhausted 	<ul style="list-style-type: none"> – Remove individual or close case – Send ANPA (Changes) or NOA (Interim Reports) 	N/A Individual not currently meeting Work Requirement (maintaining) or exempt
	Yes	Authorize through remainder of cert period, no time-limited months will be used				

* PM (prorated months) and E9 (special exemption) codes will be utilized to establish a 6-month certification period

* The E9 code is not applicable when an individual's status changes during an established certification period.

TIME FRAME ON CHANGES

Assess the impact on Work Requirement status effective **the month after the month of the change.**

- Patricia is working 20+ hours a week at initial certification. Her case is certified for 12 months, from January to December.
- In early April, Patricia reports that she is no longer working.
- She does not meet an exemption and must now use her **Y1** months beginning in May.
- Patricia will not be eligible after July if she does not meet an exemption.
- An advance notice must be used to notify her that she has exhausted her three months of time-limited benefits.

January

December



Note that **E9** months do not apply when an individual's status changes during an established certification period.

RETROACTIVE CHANGES TO THE CLOCK

In some cases, the BPS may not learn of a change in exemption status timely.

It may be appropriate to change the clock retroactively **in certain circumstances.**



When evaluating these situations, it is important to consider:

- The type of information that has changed
- The length of the certification period, which determines the household's reporting requirements
- Whether the change was required to be reported, based on the reporting requirements for the certification period assigned
- If the household received benefits it would not have been entitled to if reported timely

RETROACTIVE EVALUATION



Per guidance at 14.A.3, action must be taken on all changes, regardless of whether the household is required to report the change.

Once a household reports a change, there must be an assessment of when the change occurred and the impact on the household or individual household member.

In reevaluating situations, you must factor in income or other elements that could alter benefit amounts.

***Y2 months run consecutively and must not be changed after certification except when granted in error**

Remember!

Type of Change Reported/Discovered Retroactively	Change to the Clock
<p>No benefits received in any state while case was closed <i>Since current 36-month clock began</i></p>	<p>NB Code should be entered at intake to any month to which it applies</p>
<p>Lost exemption <i>e.g. 12-month cert period Lost exemption due to child leaving the household</i></p>	<p>Not Required to Report No retroactive change to clock</p>
<p>Lost exemption <i>e.g. 12-month cert period Lost exemption due to no longer working 20+ hours/week</i></p>	<p>Required to Report LE code entered retroactively as a placeholder to evaluate for a possible overpayment</p>
<p>Changing a Y1  month to an exemption or NB code <i>e.g. Became disabled while using Y1/E9 months, or benefits expunged</i></p>	<p>Once verified, appropriate exemption code may be entered retroactively</p>
<p>Changing a Y1  month to E1 <i>Was meeting the Work Requirement while using Y1/E9* through paid work activity of 20+ hours/week</i> Volunteer/in kind work not valid for retroactive changes from Y1 to E1 based on employment</p>	<p>May be changed retroactively if:</p> <ol style="list-style-type: none"> 1. Verification has been received; and 2. A claim has been established for any months the customer received benefits with previously unreported income; and 3. Claim has been repaid in full

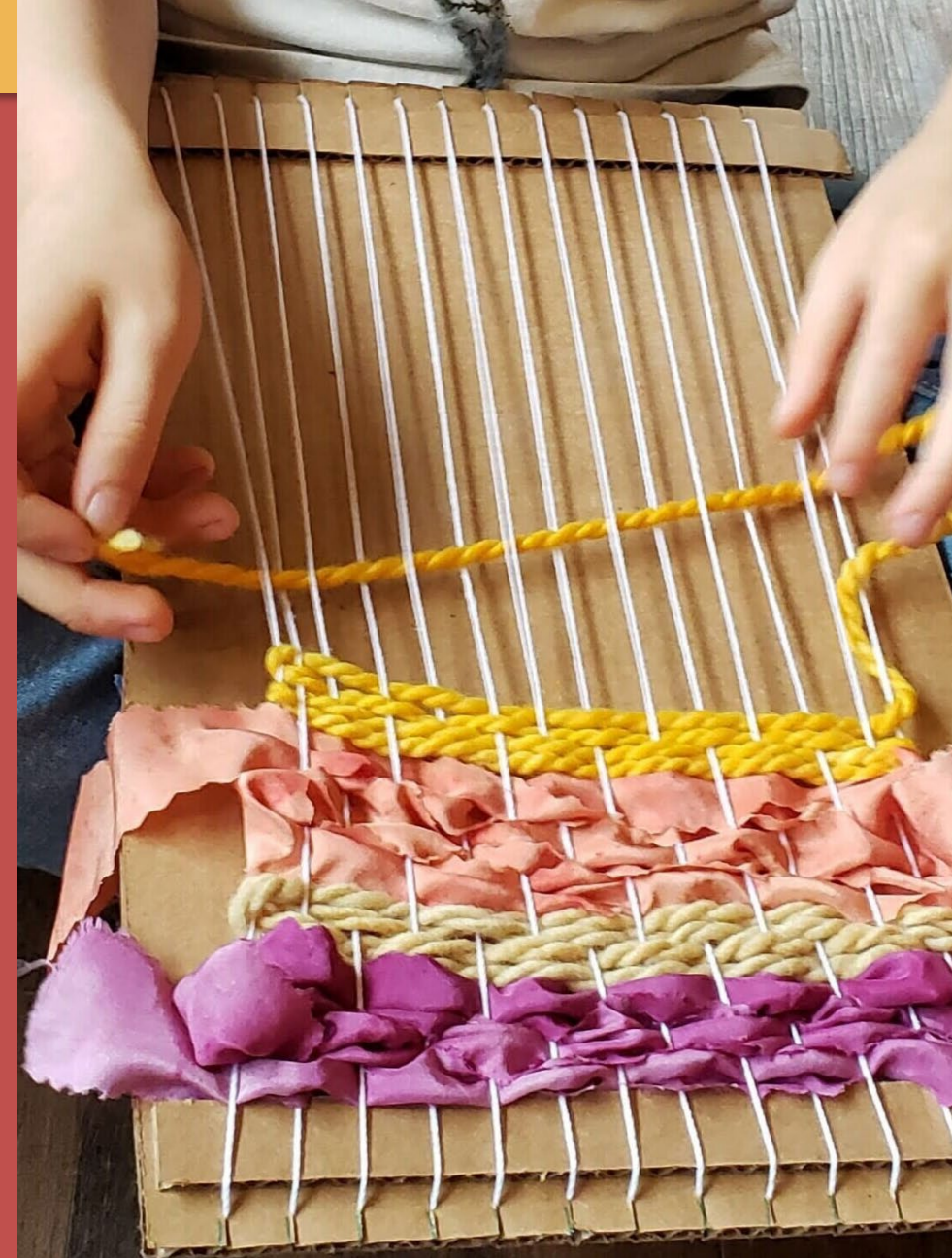
WHAT'S NEW

Effective 11/1/2025

H.R.1 (2025)

CHANGES TO THE WORK REQUIREMENT

- Raises the upper age limit for individuals exempt based on age to **65**
- Lowers the age of children in the SNAP household that allows adult household members an exemption to **13 years old**
- Eliminates the work exemptions for:
 - Homeless individuals*
 - United States veterans
 - Individuals age 18-24 that have transitioned out of foster care
- Establishes a new exemption for individuals defined in the Indian Health Care Improvement Act and the Alaska Native Claims Settlement Act



* *Chronic homelessness is still a valid exemption*

THE PAST, PRESENT, & FUTURE OF THE WORK REQUIREMENT

JUL 2023

SEP 2023

OCT 2023

OCT 2024

NOV 2025

Fiscal Responsibility Act (FRA) Changes

House Resolution 1 (HR1) Changes

New exemption established for certain individuals defined in the IHCA

New clocks started for all participants

Temporary exemptions began

Upper age increase

Upper age increase

Temporary exemptions end

Age-related changes

Age 18-49

Age 18-50

Age 18-52

Age 18-54

Age 18-64



- Veterans
- Homeless
- Former foster care recipients ≥ 24

- ~~Veterans~~
- ~~Homeless~~
- ~~Former foster care recipients ≥ 24~~

Caring for a Dependent Child' exemption now applies to an adult member of a SNAP household with a child **under 14**

When screening applications, also be aware of benefits that may have been issued in exempt localities during this time period. **Part 15, Appendix 1**

1996

Work Requirement Implemented

**APR 2009-
SEP 2010**

Work Requirement suspended

**APR 2020-
JUN 2023**

Work Requirement suspended

RESOURCES

SNAP pages on Fusion:

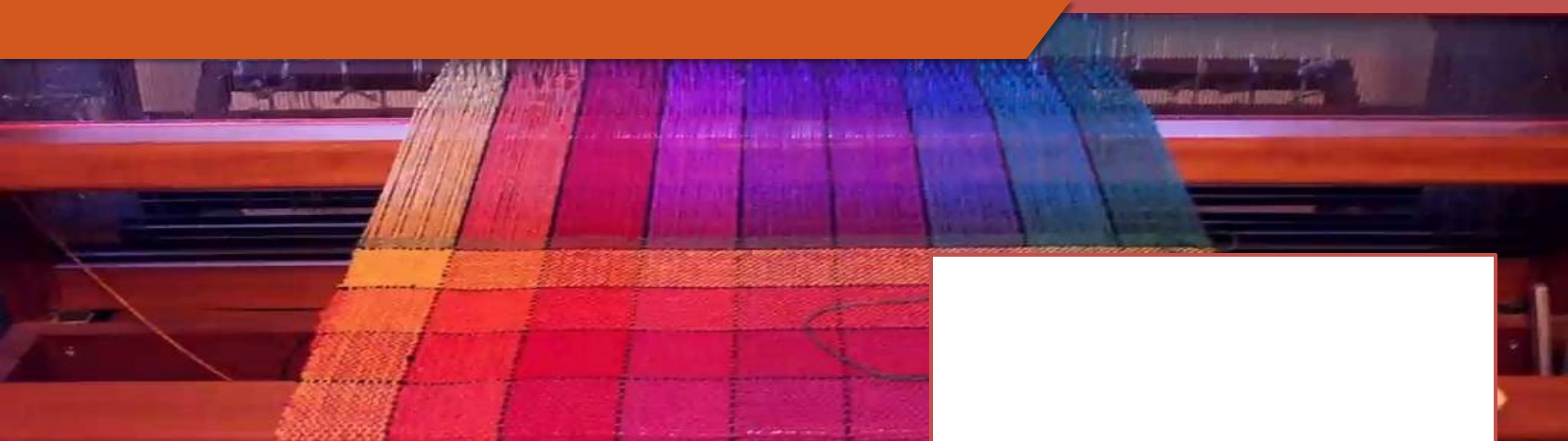
- Work Requirement Evaluation Guide
- Cracking the Code: The Work Requirement Clock
- Work Requirement BPRO training presentations

eLearning modules in the COVLC:

- BPSE2700: SNAP Work Registration and Work Requirement

LTD Training Webinars

- Virtual training on Work Requirement
- November 5, 6, 12 & 13



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THANK YOU!