

James I. Dimas, Secretary

SNAP Work Requirement - ABAWD Time-Limited Benefits Starting 01/01/18



11/30/17

Policy Memo

Summary

- All SNAP customers who are not specifically exempted by law are subject to SNAP work rules as a condition of eligibility. These work rules are referred to as Work Provisions ([PM 03-15-01](#)), ([PM 03-15-02](#)).
- The SNAP Work Requirement ABAWD Time-Limited Benefits policy applies to able-bodied adults without dependents (ABAWDs) who are between the age of 18 through 49, and are receiving SNAP, do not meet an exemption reason and are not residing in a waived area.
- ABAWDs are a subset of the Work Provision SNAP population. An ABAWD must meet all the general Work Provision rules, like register for work and not voluntarily quit a job. When the Work Requirement policy is in effect, it requires an ABAWD to also meet certain special SNAP work rules in addition to the Work Provision requirements in [PM 03-15-01](#). The ABAWD must work at least 80 hours per month, or participate and comply with a SNAP E&T Program activity, or take part in an approved workfare program, or perform community work for the required number of hours per month, or a combination of these to meet the required number of hours per month. If the special SNAP work rules are not met a non-exempt ABAWD can only receive 3 full months of SNAP benefits in a 3-year period. This is called Time-Limited Benefits.
- Currently the entire State is exempt from the SNAP Work Requirement ABAWD Time-Limited Benefits policy through 12/31/17 due to a Food and Nutrition Service (FNS) waiver approval. This waiver allows customers to receive SNAP without being limited to 3 months of SNAP benefits in a 36-month period, if the work requirement is not being met.
- Effective January 2018, DuPage County is non-exempt from the SNAP Work Requirement ABAWD Time-Limited Benefits policy. All other counties in Illinois are exempt from the SNAP Work Requirement ABAWD Time-Limited Benefits policy through December 2018. A non-exempt customer's eligibility for SNAP is limited to three months of ABAWD Time-Limited Benefits in a 36-month period, if he or she is not meeting a work requirement and does not have a qualifying exemption. A person who lives in DuPage County and has their case serviced by another county is still subject to SNAP Work Requirement ABAWD Time-Limited Benefits policy. The Office of Choice is responsible for enforcing the Work Requirement ABAWD Time-Limited Benefits policy and monitoring the eligibility of the customer for SNAP. Non-exempt customers residing in other counties are still required to participate in SNAP E&T in counties where there are provider slots and resources available.
- The 36-month period is a 3-year fixed period that begins 01/01/18 and ends 12/31/20. This means that non-exempt customers residing in DuPage County (regardless of their Office of Choice) are at risk of losing their SNAP eligibility, if they are not employed, or performing community work or participating in a workfare program for at least 20 hours per week.
- DuPage County staff, as well as staff at an FCRC servicing a DuPage County resident's case, should become familiar with this policy and begin to prepare for implementation before the waiver expires on 12/31/17.
- The SNAP Work Requirement ABAWD Time-Limited Benefits policy applies to all initial applications, REDEs and active cases of customers residing in DuPage County **AND** at the Office of Choice effective January 2018. January is the first countable month for the ABAWD Time Limit Clock for initial applications, REDEs and active cases, if a full month of SNAP benefits is received.
- When interviewing a customer, the HSC must answer a question in IES, "Is there a SNAP unit member age (18-49) potentially subject to the SNAP work requirement?" with the appropriate Yes/No response in the "Time Limited Section" of the "Non-Financial Question Summary" screen. IES will default to blank, if the

question is not answered. This may result in the person not being properly identified as an non-exempt ABAWD.

- A non-exempt customer who receives 3 full months of benefits (January, February, March) and is not meeting the work requirement loses their eligibility for SNAP effective for April 2018. A prorated month of benefits does not count towards the 3 ABAWD Time-Limited Benefit months.
- Only the individual who is not meeting the work requirement is ineligible for benefits. For a single person SNAP only case, IES will cancel SNAP effective for the 4th month, if a customer has received 3 full months of time-limited benefits and the work requirement was not met. IES will send Form 360c to inform a customer of the cancellation. When the SNAP unit includes more than one person, IES will disqualify the ineligible person for SNAP.
- CN 17.07 was mailed in November to customers whose place of residence is in DuPage county (regardless of where the case is serviced) to inform them about the change and what they must do to meet the SNAP work requirement.
- For new applicants, the HSC should issue the SNAP Work Requirement Fact Sheet (Form 3674) to all customers meeting the criteria of an ABAWD and explain the Work Requirement policy to them.
- An IES centrally generated notice will be mailed 60 days prior to the birth date of a 17-year old child turning 18 years old to notify them that they have been identified as a person who may now need to meet the work requirement.
- Prior to IES Phase 2, customers residing in DuPage County (regardless of where the case is serviced) were centrally changed from Mid-Point Reporting status to Change Reporting status. Form 3324 was centrally mailed to notify customers of the change in reporting requirements. New applications and REDEs are to be approved in Change Reporting status.
- It is important that the HSC reviews the ABAWD Time Limit Clock monthly to ensure that it accurately reflects a met or unmet month for the customer. IES determines an ABAWD at the individual level. An individual who is a mandatory ABAWD displays on the IES EDG Summary page. When eligibility runs, the ABAWD Time Limit Clock will count a month as unmet, unless an override is done to show the month as met. IES automatically sets the ABAWD Time Limit Clock as unmet at the schedule cut-off prior to the time-limit countable month, except for the application month. FCRC staff must do an override to prevent a month from counting toward the time-limit, if appropriate.
- A non-exempt customer must cooperate with SNAP E&T, if the county servicing the case has a SNAP E&T Provider. A non-exempt customer that does not comply with the requirements of SNAP E&T can still be sanctioned. The SNAP Work Requirement ABAWD Time-Limited Benefits policy would not apply because the customer has already lost SNAP eligibility due to the sanction.
- A non-exempt customer may regain eligibility after receiving their ABAWD Time-Limited Benefits. After eligibility is lost, a non-exempt customer can regain eligibility by working or participating in a work activity for the required number of hours in a 30 consecutive day period prior to the date of application. A customer qualifies to receive SNAP as long as they continue to meet the work requirement monthly. If later, the individual stops working or participating in a work activity then they will qualify for a one-time only additional 3 consecutive months of SNAP benefits. After receiving the 3 consecutive months of SNAP the individual remains ineligible for benefits for the remainder of the 3-year period, unless he or she regains eligibility or becomes exempt. There is no limit to the number of times a person may regain eligibility.
- A chronically homeless individual, if determined unfit to work may be exempt from meeting the work requirement.
- SNAP Work Requirement Request Medical/Service Provider Unfit to Work Determination (Form 2340), is created to help customers verify their inability to work. This form is optional. A customer is not required to use this form to verify their inability to work.
- SNAP Work Requirement Request for Exemption (Form 2341), is completed by the customer who is requesting an exemption from the work requirement, if the reason for the exemption is not obvious to the HSC.
- Community Work Information (Form 3675) is revised and is used by SNAP E&T counties. A Community Work form will be created for DuPage County to use since it is not a SNAP E&T county.
- As a reminder, FCRCs must still operate a SNAP E&T program where provider slots and resources are available. FCRCs with a SNAP E&T program are responsible for keeping a waiting list of non-exempt persons

that are required to participate in SNAP E&T. When a slot becomes available refer a non-exempt person to a provider on a first come first serve basis. Due to no provider, Lake County is no longer a mandatory SNAP E&T county. The SNAP Work Requirement ABAWD Time-Limited Benefits policy does not apply to these counties unless, a county is an Office of Choice for a resident of DuPage County.

- This policy memorandum clarifies "No Wrong Door" policy. Once an applicant is determined eligible for assistance he or she has a right to request to have their case transferred to another FCRC for his or her convenience. For all counties in the State, grant the request to transfer a customer's case for his or her convenience based upon one of the following factors: location of his or her employer; location of his or her child care provider; access to reliable transportation; the location of a social service provider that he or she sees on a regular basis.
- Effective with this policy memorandum, a Client Assessment Unit Determination (CAU) is no longer needed to determine if a SNAP person is mentally or physically unable to work. FCRCs should not send Form 183 or medical records to CAU.
- Effective with this policy memorandum, as a reminder to all FCRCs, cash and SNAP applicants must receive the Illinois Link Brochure, WCS 9203. When an applicant is in the FCRC, hand them the brochure. When mailing the Link card, also send the Illinois Link Brochure, WCS 9203.

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State Exemption

Currently the entire state is exempt from the SNAP Work Requirement ABAWD Time-Limited Benefits policy for able-bodied adults without dependents (ABAWDs) 01/01/17 through 12/31/17 due to FNS waiver approval. This means that ABAWDs are not limited to receiving SNAP benefits for 3 months in a 36-month period, if they

do not meet the work requirement.

What will Change January 2018?

- Effective January 2018, the SNAP Work Requirement ABAWD Time-Limited Benefits policy will be implemented in DuPage County. This policy change is effective January 2018, for all initial applications, REDEs and active cases received for non-exempt customers residing in DuPage County **AND** at the Office of Choice servicing a DuPage County resident's case. This means that customers residing in DuPage County, regardless of Office of Choice, are subject to 3 months of time-limited SNAP benefits and are at risk of losing their SNAP eligibility.
- The Office of Choice is responsible for applying the SNAP Work Requirement ABAWD Time-Limited Benefits policy to a customer, monitoring eligibility, ensuring that the ABAWD Time Limit Clock is correct and providing the customer with resources to help them meet the requirement.
- An individual must cooperate with SNAP E&T, if the county servicing the case has a SNAP E&T Provider. An individual that does not comply with the requirements of SNAP E&T can still be sanctioned. The SNAP Work Requirement ABAWD Time-Limit Benefits policy does not apply because the individual has already lost SNAP eligibility due to the sanction.
- DuPage County staff, as well as staff at an FCRC servicing a resident's case, should become familiar with this policy and begin to prepare for implementation before the waiver expires on 12/31/17.

Notifying the Customer

- CN 17.07 was mailed in November to active customers residing in DuPage County (regardless of where the case is serviced) to inform them about the change and what they must do to meet the SNAP work requirement.
- For new applicants, the HSC must issue the SNAP Work Requirement Fact Sheet (Form 3674) to the customer and explain the work requirement policy. It is important that the customer understands the work requirement and the potential loss of SNAP eligibility, if they do not comply. A customer who is not meeting the work requirement by the third month is at risk of losing eligibility. Approve the case in Change Reporting status.
- Prior to IES Phase 2, customers residing in DuPage County (regardless of where the case is serviced) were centrally changed from Mid-Point Reporting status to Change Reporting status. Form 3324 was centrally mailed to notify customers of the change in their reporting requirements.

Approval Periods

IES assigns a 12-month approval period to all SNAP approvals. If a non-exempt person is not meeting the work requirement after receiving 3 full months of ABAWD Time-Limited Benefits IES will systematically cancel their case.

- A person working 80 hours or more per month is meeting the SNAP Work Requirement ABAWD Time-Limited Benefits policy. Assign a 12 month approval period in Change Reporting status. Inform the customer that they must report when their hours fall below 20 hours per week and when the earned income changes by \$100 or more.
- If a person is temporarily exempt from the work requirement due to a medical condition, set a task as reminder to follow-up with customer prior to date that the exemption is expected to expire.

Helping the Customer Meet the SNAP Work Requirement

- DuPage County does not operate a SNAP E&T program. A customer living in DuPage will not have SNAP E&T as an option to meet the requirement, unless the program is offered at the Office of Choice. While these individuals are receiving SNAP benefits, the FCRCs will work together to provide any assistance that is reasonable to help these individuals obtain at least a 20 hour per week job or an assessment of the individual will be completed and based on his or her needs the appropriate referrals to a community partner that offers services that addresses those specific needs will be made.
- Customers may be referred to the Illinois WorkNet Center which offers a variety of services. An individual who goes to the Illinois WorkNet Center and actively engages in 20 hours of job search at the site per week meets the work requirement. Verify that the requirement was met. Job search is not an allowable countable activity for any other county.

- An Office of Choice with a SNAP E&T program, must engage the individual in a countable SNAP E&T activity. A customer must take part and comply with one of the following: Basic Education, Vocational Training, Work Experience, Community Work, Earnfare.
- A customer may also self-initiate work at community-based organizations, churches, or other organizations. Use Community Work Information (Form 3673) to verify community work. Form 3673 must be completed and signed by a representative of the organization to verify hours of volunteer work performed each month. For SNAP E&T the required number of hours is based on the SNAP benefit amount received. For DuPage County, the required number of hours is 20 hours per week. A new community work form is created for use in non-SNAP E&T counties.
- An individual may also perform workfare at a local governmental unit for the required number of hours and meet the requirement. For SNAP E&T counties, the number of hours a person must work depends on their SNAP benefits amount. Use the Participation in Community Work Program (Form 4019) to verify that the person meets program requirements each month. For DuPage County, the required number of hours is 20 hours per week.

The SNAP Work Requirement ABAWD Time-Limited Benefits policy applies to persons living in DuPage County **AND** their Office of Choice. As a reminder, all counties must still operate a SNAP E&T program where Provider slots and resources are available. FCRCs with a SNAP E&T program are responsible for keeping a waiting list of non-exempt persons that are required to participate in SNAP E&T. When a slot becomes available refer a nonexempt person to a provider on a first come first serve basis.

Who Must Meet the SNAP Work Requirement ABAWD Time-Limit?

A person must meet the SNAP work requirement if they are residing in a non-waived area and:

- are age 18 through 49; and
- receive SNAP benefits; and
- do not qualify for an exemption

What is the SNAP Work Requirement ABAWD Time-Limit?

All SNAP customers who are not specifically exempted by law are subject to SNAP work rules as a condition of eligibility. These work rules are referred to as Work Provisions in [PM 03-15-01](#). ABAWDs are a subset of the Work Provision SNAP population. In addition to the Work Provisions, an ABAWD must meet additional work requirements in order to receive SNAP benefits beyond the 3-month time limit in a 3-year fixed period. An ABAWD must meet all the general SNAP work rules, like register for work and not voluntarily quit a job, as well as the following requirements:

- Work an average of 80 hours per month.
- Take part in and comply with one the following activities of the SNAP E &T Program, if available: Basic Education, Vocational Training, Work Experience, Community Work, Earnfare.
- Take part in an approved workfare program of a local governmental unit for the required number of hours per week.
- Do community work at agencies, churches, or other organizations in the community for the required number of hours per week.

Receipt of income-in-kind meets the work requirement, if a person is actively engaged in work for 80 hours or more per month.

Example: Ms. G applies for SNAP in March. She does not have income. She states that she lives in a motel room and does not have any expenses. She cleans the hotel rooms daily for the motel owner in exchange for her living there rent free. The motel owner provides a statement that Ms. G works 80 hours per month. Ms. G meets the work requirement by working 80 hours a month in exchange for the motel room.

Note: In counties with SNAP E&T the number of hours of participation in community work and workfare is based on the amount of SNAP benefits received. In DuPage county the required number of hours is 20 hours per week.

Who is Exempt from the SNAP Work Requirement ABAWD Time-Limit?

A person who meets one of the exemptions below is not subject to the work requirement and time-limited SNAP benefits.

The person is:

- under age 18 or 50 years of age or older; or
- physically or mentally unfit to work, or pregnant; or
- living in a SNAP household with a child under 18; or
- otherwise exempt from the SNAP Work Provisions in [PM 03-15-02](#)

Note: Everyone who is age 18-49 is exempt if there are children under age 18 in the SNAP unit

Example: The SNAP only unit consists of Mr. D, age 45, Mrs. D, age 35, and Ms. R and her 3 children who are under age 18. Because Mr. D and Mrs. D are members of an SNAP unit with children under the age of 18, they are exempt from the work requirement.

Eligibility Limits - Three Countable Months of ABAWD Time-Limited Benefits

A non-exempt customer's eligibility for SNAP is limited to three full months of time-limited benefits for the fixed 3-year period, if he or she is not meeting the work requirement and does not qualify for an exemption. The fixed period begins January 1, 2018 and ends December 31, 2020. Prorated SNAP benefits do not count toward a time-limited month. The time-limited months do not have to be consecutive. Once the 3 month time-limited benefits have been received a nonexempt customer remains ineligible for the remainder of the 3-year period, unless he or she regains eligibility or becomes exempt.

A month is counted as a time-limited benefit month when a nonexempt person receives a full month of SNAP benefits and:

- is not meeting the work requirement; and
- does not meet an exemption from the work requirement; or
- does not verify an exemption from the work requirement.

Starting the ABAWD Time Limit Clock

- The SNAP Work Requirement ABAWD Time-Limited Benefits policy applies to all initial applications, REDEs and active cases of customers residing in DuPage County **AND** at the Office of Choice.
- The HSC must answer a question in IES, "Is there a SNAP unit member age (18-49) potentially subject to the SNAP work requirement?", correctly in the "Time Limited Section" of the "Non-Financial Question Summary" screen. IES will default to blank, if the question is not answered. This may result in the person not being properly identified as an non-exempt ABAWD.
- January is the first countable month for the ABAWD Time Limit Clock for any non-exempt customers who are not meeting the work requirement. If a non-exempt person receives 3 full months of SNAP for January, February and March and does not meet the work requirement during any of those months, eligibility for SNAP ends effective April 2018. The 3 ABAWD Time-Limited Benefit months do not have to be consecutive.
- It is important that the HSC reviews the ABAWD Time Limit Clock monthly to ensure that it accurately reflects a met or unmet month for the customer. IES determines an ABAWD at the individual level. An individual who is a mandatory ABAWD displays on the IES EDG Summary page. When eligibility runs the ABAWD Time Limit Clock will count, unless the month is shown met.
- IES automatically sets the ABAWD Time Limit Clock as unmet at the schedule cut-off prior to the time-limit countable month, except for the application month. The HSC must do an override to prevent a month from counting toward the time-limit, if appropriate. See example below.
- IES will centrally generate a notice 60 days prior to the birth date of a 17-year old turning age 18.

Example: Mr. Q applies for SNAP on 03/20 and the HSC processes the application on 04/01. At the time of application Mr. Q is not meeting the work requirement. March is a prorated month.

Eligibility Month	IES Actions	Action Date is Schedule cut-off, except for the application month. For the month of application the Time Limited Clock will count the

		month met/unmet on the day the application is processed.
04/01/17	ABAWD Month 1 (Unmet)	04/01/17
05/01/17	ABAWD Month 1 (Unmet)	04/15/17
06/01/17	ABAWD Month 3 (Unmet) and Mass Change Trigger Closure created	05/15/17
07/01/17	SNAP Closure	05/16/17 (Processing effective July, schedule cut-off 06/15/17)

Note: In order to set the ABAWD Time Limit Clock functionality for implementation effective January 2018. The Clock will begin ticking at schedule cut-off in December 2017 for all active cases. January will default to unmet. The HSC must review the ABAWD Time Limit Clock for accuracy and do an override for the month of January, if appropriate.

Maintaining Eligibility

In order to continue ongoing eligibility for SNAP a non-exempt customer must meet the work requirement monthly so that the SNAP Work Requirement ABAWD Time-Limited Benefit months are not counted.

If an individual is exempt for the month, the month is not considered as a countable month. It makes no difference when within the time frame that the three months of participation are used. The time-limited benefit months do not have to be consecutive.

When Does Eligibility End?

Only the individual(s) who is not meeting the work requirement is ineligible for benefits.

- For a single person SNAP only case, IES will cancel SNAP effective for the 4th month, if a customer has received 3 full months of time-limited benefits and the work requirement was not met. IES will send Form 360c to inform a customer of the cancellation.
- When the SNAP unit includes more than one person, only the person(s) who did not comply with the work requirement are ineligible for SNAP. IES will disqualify the person for SNAP.

Example 1: Ms. L applied for SNAP 01/20/18. The HSC gives Ms. L the SNAP Work Requirement Fact Sheet (Form 3674) and explains the work requirement policy. Ms. L does not meet a work requirement exemption reason. She is not employed and does not want to do community work or be referred to other resources. Ms. L is eligible to receive SNAP for January, February, March, and April only. January is a prorated month. Ms. L's ABAWD time-limited SNAP benefit months are February March and April. Her SNAP benefits are canceled effective May 2018 for not meeting the work requirement. Unless, Ms. L becomes exempt or regains eligibility by meeting the work requirement, she is ineligible for SNAP benefits until 01/01/21.

Example 2: Mr. H has an active SNAP case and is certified through March 2018. He was sent CN 17.07. Mr. H is not exempt and is not meeting the SNAP work requirement. He received his 3 months of ABAWD time-limited benefits January, February and March. Mr. H files a REDE application in March. His application is denied because he is not meeting the work requirement. He must regain eligibility by meeting the work requirement or become exempt before he is eligible to receive SNAP again in the 3-year period.

Example 3: Ms. K receives SNAP on an active ACA medical case and is certified through June 2018. Ms. K is not exempt. She is eligible for January, February, and March. She contacts the FCRC in March and states in February she did community work at her local church for 20 per week and provides proof. She did not do any work in January or March. Ms. K has used 2 months of her time-limited benefits when she did not comply with the requirement. The HSC must over-ride the month of February by correcting the ABAWD Time Limit Clock to show the work requirement met in February. If Ms. K does not comply in April she will use her 3rd month of eligibility and IES will cancel her case effective May 2018.

Regaining Eligibility

An individual who has lost SNAP eligibility by exhausting their 3 month ABAWD Time-Limited Benefits may regain eligibility at any time.

A person may regain eligibility by fulfilling the ABAWD work requirement during a 30 consecutive day period prior to the date of application by working or participating in a work activity for the required number of hours or by meeting a criterion for exemption, or when their 36-month clock is reset in the next 3-year period.

To regain eligibility an individual must in a 30 consecutive day period prior to the date of application:

- Work an average of 80 hours per month; or
- take part and comply with one of the following SNAP E&T activities, if available: Basic Education, Vocational Training, Work Experience, Community Work, Earnfare; or
- take part in an approved workfare program of a local governmental unit for the required number of hours. For SNAP E&T counties, the number of hours a person must work depends on their SNAP benefits amount. For DuPage County, the required number of hours is 20 hours per week; or
- do community work at agencies, churches, or other organizations in the community for the required number of hours. For SNAP E&T the required number of hours is based on the SNAP benefit amount received. For DuPage County, the required number of hours is 20 hours per week; or
- any combination of work and participation in a work program.

An individual remains eligible to receive SNAP in the following month as long as he or she continues to work the required number of hours, or participates and complies with community work or a workfare program for the required number of hours.

Example: Mr. J lost SNAP eligibility effective April. He becomes employed on May 10th and has to work a total of 80 hours within the next 30 days in order to regain eligibility for the next benefit month.

Once an individual's case is canceled he or she has to file a new application to begin receiving SNAP again. If an application is received, determine if the individual has regained eligibility. The individual qualifies when the requirement has been met and the person is otherwise eligible for SNAP. A person who starts work or starts a work program can reapply for SNAP as soon as he or she has worked or participated 80 hours in a 30 day period and it is determined that the customer will continue to meet the requirement.

Example: Ms. B has received her 3 month ABAWD Time-Limited Benefits January through March. Ms. B starts a 20 hour per week job on June 1st and works 20 hours per week. Ms. B applies for SNAP on July 1 and provides pay stubs showing she has worked 80 hours and is still employed. Ms. B has regained eligibility to receive SNAP ongoing.

- A new application is not required when a member of a SNAP unit is removed from the case for failing to meet the work requirement. The household must request that the member be added back to the case and he or she must meet all other eligibility requirements. Add the person to the case the month following the month that the change was reported.
- When a SNAP application is filed and the person has used all months of eligibility in the 3-year period they must verify that they have regained eligibility in a 30 consecutive day period prior to the date of application. In order to be eligible to receive SNAP the individual must be able to show proof that they can maintain eligibility before the application is approved. There is no limit on the number of times a person may regain eligibility.

At re-application, an individual who has received 3 months of ABAWD Time-Limited Benefits and has not met one of the work requirements in a 30 consecutive day period prior to the date of application is ineligible for SNAP. The resources of the person are counted in their entirety for the remaining eligible SNAP household members. A pro-rated share of the ineligible person's income is budgeted.

Additional 3 Consecutive Months of SNAP

A person who regains and maintains eligibility but later stops meeting the work requirement is eligible for an additional 3 consecutive months of SNAP. The period begins on the date an individual first notifies the FCRC that they are no longer meeting the requirement. A prorated month does not count as one of the 3 months. The second 3 month period runs for 3 consecutive countable months regardless of whether or not the person receives benefits in all 3 months. The second 3 consecutive months is issued only one-time in any 3-year period.

Example: Mr. J received his ABAWD Time Limited Benefits January through March. His case was canceled effective April. Mr. J reapplies for SNAP in May and is approved for ongoing SNAP benefits. He is employed working 30 hours per week. On September 30, Mr. J reports that due to it being seasonal work his job ended on 09/30/17. Mr. J's 3 consecutive months of SNAP are October, November, and December. FCRC staff must

cancel Mr. J's case effective for January 2019. Form 360c is centrally sent informing Mr. J that he no longer meets the work requirement. Unless Mr. J regains eligibility again or becomes exempt he is no longer eligible for benefits until January 2021. October is the first month that Mr. J did not meet the work requirement.

Medical Exemptions

Temporary Illness

The FCRC exempts a person due to a temporary illness if there is medical evidence provided by the client or other evidence that the illness or injury is serious enough to temporarily exempt the client. Evidence for temporarily exempting a client includes, but is not limited to:

- observing a cast on a broken leg; or
- receipt of Workers' Compensation; or
- knowledge of a scheduled surgery or recuperation from surgery.

Note: Minor ailments and injuries such as colds, broken fingers, or rashes are not normally serious enough to exempt a person.

Chronic Illness

The FCRC exempts a person who is mentally or physically unable to work due to a chronic illness if a medical provider or service provider finds that a physical or mental impairment, either by itself or in conjunction with age or other factors, prevents the customer from working or participating in SNAP E&T. The receipt of disability benefits can also verify the exemption, regardless of the percentage of disability or level of payment, such as SSI, SSA, Railroad Retirement, AABD, or VA, or receipt of a government or a private temporary or permanent disability benefit.

Chronic Homelessness

A person who is experiencing chronic homelessness and is determined unfit to work may qualify to be exempt from the work requirement.

Verify the Exemption

- If an individual's disability is not obvious to the HSC or the individual is not receiving a disability benefit, the HSC should request that the customer provide proof from a medical professional or service provider.
- Verification can be obtained via written statement or by using the new form SNAP Work Requirement Request Medical/Service Provider Unfit to Work Determination (Form 2340). This is an optional form. Verification may be accepted from a physician, physician's assistant, nurse, nurse practitioner, designated representative of the physician's office, a licensed or certified psychologist, a social worker; a counselor or staff person at a drug and alcohol program, or a social worker or staff person at a homeless or domestic violence services provider or shelter; or any other medical personnel determined appropriate.
- Document the proof used to support the exemption.
- Establish an exemption review date based on the information obtained and the customer's condition. When a person with a temporary illness exemption becomes physically and/or mentally fit, change their work exemption status to nonexempt, unless another exemption reason applies.

Change in ABAWD Status

A change from a non-exempt person who is not meeting the work requirement to a person who is exempt from the work requirement is effective the month the change is reported.

Example: Ms. T receives SNAP and is not exempt from meeting the work requirement. The 3 ABAWD Time-Limited Benefit months are January, February and March. She reports on February 5, she is pregnant. Ms. T's ABAWD status changes to exempt effective February (month of report). FCRC staff update Ms. T's ABAWD Time Limited Clock to show that only January was used toward her 3 month's ABAWD time -limited benefits.

The status of a person meeting the work requirement changes to not meeting the work requirement in the month in which the nonexempt person becomes non-compliant and is considered a countable unmet month.

Case Transfers

The SNAP Work Requirement ABAWD Time-Limited Benefits policy applies to nonexempt customers whose place of residence is in DuPage County, regardless of where their case is serviced.

Clarification on No Wrong Door Policy

This policy memorandum clarifies "No Wrong Door" policy. Once an applicant is determined eligible for assistance he or she has a right to request to have the case transferred to another local office for his or her convenience. For all counties in the State, grant the request to transfer a customer's case for his or her convenience, based upon one of the following factors:

- location of his or her employer;
- location of his or her child care provider;
- access to reliable transportation;
- the location of a social service provider that he or she sees on a regular basis.

Within five business days after the request for transfer, the local office will transfer the case. The location of the case may be reconsidered, based upon the criteria per the recipient's request or at time of redetermination of eligibility.

SNAP E&T and Lake County change

Due to no provider, Lake County is no longer a mandatory SNAP E&T county.

Student Exemption Expanded

The student eligibility exemption is expanded to allow college students to qualify for SNAP benefits if they are enrolled in an employment training program under Carl D. Perkins Career and Technical Education Improvement Program or are in a special career program or community education program that leads to employment.

Illinois Link Brochure

All cash and SNAP applicants must receive the Illinois Link Brochure, WCS 9203. When an applicant is in the FCRC, hand them the brochure. When mailing the Link card, also send the Illinois Link Brochure, WCS 9203.

[Signed copy on file]

James T. Dimas

Secretary, Illinois Department of Human Services

Forms referenced:

CN 17.07

Form 183

Form 2340

Form 2341

Form 3324

Form 3675

Form 3674

Form 4019A

WCS 9203