

# Policy Clarifications –

**Submitted:**

**Agency: CAOs**

**Subject:** Deeming Community Service Hours in Non-Pure TANF/SNAP Households

**Question:**

Currently, when we perform the computation to determine the number of community service hours that can be deemed, we add the cash grant and the food stamp grant of the pure household, then divide by minimum wage. Now that non-pure households are eligible for deeming, do we still use the Cash/FS allotment, or do we only use the program that is pure?

Example: I have a cash client referred to a contractor. Cash grant is in her record number and all members of the household are on the grant (2 person grant).

She is also receiving SNAP in her mother's record – this is a SNAP household of 9 people.

Do we use the SNAP grant in the computation for community service hours?

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**Response By:** BETP

**Date:** 4-14-14

When computing the number of community service hours to be deemed in cases like this, use the SNAP grant in the computation.

The Federal Register Vol. 73, No 24, February 5 2008 (73 FR 6804) states: "We believe that participation in work activities is crucial for families to move from dependence on public support to increased self-sufficiency. Further reducing the hours required is contrary to the goals of the TANF program. We do not believe that the policy generates inequalities, because the number of hours that a family must participate to count in the work participation rate is directly based on the value of the combined benefits up to a maximum required for that TANF recipient. If a family has a reduced work obligation because of deeming, it is because that family receives less support from the government than a family with a higher work obligation. This policy is not intended to be punitive. Rather, it gives States the opportunity to count a family in the participation rate with fewer hours of real participation than the State would otherwise need. With deeming we do not have to place an individual in another core activity once that individual worked the maximum hours possible under the Fair Labor Standards Act rules.