

Policy Clarification

Employment and Training- All - EPP-21049-535

SNAP- All - PFS-21049-535

Submitted: 7/18/2022

Agency: CAOs

Subject: Under What Circumstances can the 90-day Supplemental Nutrition Assistance Program (SNAP) Employment and Training (E&T) Retention Period Continue After SNAP Benefits Close?

Question: Can SNAP E&T participants continue receiving job retention services if SNAP closes for reasons other than excess income? For example, if a participant in SNAP E&T fails to comply with providing income verification to the county assistance office (CAO), should the E&T contractor close the job retention activity? Additionally, does the CAO have to stop issuing Special Allowances (SPALs)?

Response By: Bureau of Empl. Programs

Date: 9/28/2022

SNAP Handbook Chapter 535.44 states that E&T services and Special Allowances continue for the entire 90-day job retention period even if, "...wages from the employment cause the SNAP budget to close." This language should be interpreted broadly to include circumstances like the example described above, as well as circumstances where a participant voluntarily withdraws from receiving SNAP benefits due to their higher income.

Further, federal regulations ([7 CFR 273.7\(e\)\(2\)\(viii\) 82 Fed. Reg. 2023](#)) permit the continuation of SNAP E&T services and SPALs for the entire 90-day period, as long as the SNAP budget has not closed **due to a sanction or disqualification**.

Therefore, the E&T contractor will only close the SNAP retention activity of a SNAP E&T participant in a retention period in the following circumstances:

- The retention period ends due to reaching the 90th day;
- The retention period ends due to the individual losing their job and not subsequently enrolling in a different SNAP E&T activity; or

- The CAO determines that the individual's SNAP budget has closed **due to a sanction or disqualification**.

While the SNAP retention activity remains open, the SNAP E&T participant remains eligible to receive SPALs as long as all other SPAL eligibility criteria are met.