

Revised - Policy Clarification

Cash Assistance – All – PCA-22319-104

Medical Assistance – All – PMA- PMA-22319-304

**Supplemental Nutrition Assistance Program – All –
PFS-22319-504**

**Low-Income Home Energy Assistance – All – PLC-
PLC-22319-604**

Submitted: **November 14, 2025**
October 20, 2025

Agency: CAOs

Subject: **Revised** Furloughed Government Employee Applications

Question: We received a Commonwealth of Pennsylvania Access to Social Services application this afternoon for a federal employee (and his family). The household is applying for Cash, Supplemental Nutrition Assistance Program (SNAP) and Low-Income Home Energy Assistance (LIHEAP) and he has not received a paycheck since October 1. Has any guidance been issued regarding treatment of applications for federal employees? Can you please provide direction regarding handling of these applications for all programs? An expedited response is requested since the application is pending an Expedited SNAP review.

Response By: DFA/DFPPM

Date: October 27, 2025

County Assistance Offices (CAOs) should review federal employee applications for Cash, SNAP, Medical Assistance (MA) and LIHEAP as they would any other application.

NOTE: Government employees who have been recalled to work, but are not being paid, should be treated the same way as other currently furloughed employees.

The following are important factors to keep in mind when processing the applications:

- Cash assistance, including a Diversion payment, received due to delayed wages is subject to reimbursement, see [SHB 915](#). When interviewing the

applicant, have them sign a FIRM 176-K acknowledging that repayment may be needed.

- For example, if the cash applicant/recipient is furloughed or working without pay in October and anticipates getting back pay for October then the cash benefits received in October are subject to reimbursement. Follow procedures in [SHB 915.31](#).
 - If there is no applicable exemption, and the furloughed worker anticipates retroactive pay and TANF reimbursement, they may be granted good cause 55 to waive their Road to Economic Self-Sufficiency through Employment and Training requirements while awaiting the end of their furlough.
 - When determining eligibility for expedited SNAP, the CAO will process as usual, taking the client statement and issuing the benefits if eligible.
 - For ongoing SNAP, individuals must report a change in circumstances by the 10th day following the month of change. SNAP is not subject to reimbursement.
 - When federal employees and contractors who have been furloughed apply for SNAP:
 - All applicants should be reviewed for federal exemptions (e.g., Employment and Training Program (ETP) Code 14: applied for/receiving Unemployment Compensation).
 - If after review, they do not qualify for an exemption the CAO will assign Qual Code 5 and narrate that the individual has been granted good cause for a temporary absence from work due to circumstances beyond their control.
- NOTE:** The CAO must not assign ETP Code 15 at this time for these individuals because they qualify for a federal exemption or are meeting requirements (with good cause).
- If the individual has been recalled to work without pay, they should be evaluated to determine if the individual is otherwise exempt OR if their hours of unpaid work are sufficient to be exempt under ETP Code 17 or meet the work requirements under Qual Code 5. If the individual has been recalled to work on a part-time basis for less than 20 hours per week (but normally works 20 hours or more per week), the CAO will assign Qual Code 5 and narrate that the individual has been granted good cause for the remaining hours for a temporary reduction of work hours due to circumstances beyond their control.

- For MA, the CAO will consider the total countable earned and unearned income when determining MA eligibility. If the individual is in a “non-pay status”, their income will only be considered in the months it is received. When an individual returns to a “pay status”, the income must be reported in accordance with [MAEH 370.1](#), which states, “a change in income will be reported by the tenth day of the month after the month the individual actually gets it.”

NOTE: Most furloughed employees remain enrolled in healthcare coverage through their employer. The Third Party Liability information must be provided in accordance with [MAEH 338.2](#).

- LIHEAP eligibility is based on the previous month’s income, therefore, if the federal employee applied in November the CAO would be looking at the income received in October when determining eligibility. LIHEAP is not subject to reimbursement.