

DATE: September 30, 2026

OPERATIONS MEMORANDUM #26-09-02

SUBJECT: Certified Work Programs that Meet Supplemental Nutrition Assistance Program (SNAP) Pennsylvanians with Employment and/or Engagement Requirements (PEER) Work Rules

TO: Executive Directors

FROM: Robert Hixson, Director
Bureau of Operations

PURPOSE

To inform CAOs of newly certified local workforce programs that qualify as a way that PEERs may meet their work requirements.

BACKGROUND

The 2025 federal reconciliation bill (H.R.1) eliminated Pennsylvania's geographic waiver for SNAP work requirements statewide. That means all PEERs in Pennsylvania must meet work requirements or establish an exemption to keep SNAP benefits longer than three months in a three-year period.

DISCUSSION

Due to there being more SNAP PEERs statewide than available SNAP E&T slots, the Department has worked with the Governor's Office and Department of Labor and Industry to find additional opportunities for PEERs to meet their work requirements.

In addition to SNAP E&T and other programs listed in [SNAP HB 536.22](#), the definition of a "work program" now also includes certain employment or training programs that meet standards approved by the Governor.

Headquarters will certify programs under this standard and maintain a list of approved programs at dhs.pa.gov/workprograms, [E&T Program Map](#), and SNAP Handbook 536 Appendix C.

PROCEDURES

For work registrant and PEER purposes, the CAO will accept the individual's statement that they are enrolled half-time or more in a school, institute of higher education, or training program (including a certified work program) unless questionable. PEERs who establish an exemption due to half-time enrollment are not required to report until renewal if they disenroll or their enrollment drops below half-time.

Individuals enrolled less than half-time in a certified work program must:

- Verify their participation at least once every six months.
- Report by the 10th day of the following month if their total hours of participation (in combination with other qualifying activities) drop below 80 hours per month.

The CAO may use the **SNAP Work Requirement Verification Form** ([PA 2000, Attachment](#)) to verify:

- Enrollment in a certified work program other than SNAP E&T
- Enrollment in a CAO-Directed SNAP E&T community service activity.
 - When the PA 2000 is used to verify community service participation only, an Employment Development Plan (PA 1531) is not required.

NOTE: The CAO must [calculate the required community service hours](#) and enter them on the PA 2000 before providing it to the household.

Special Allowance (SPAL) Eligibility

Participants in certified programs are required to verify participation hours but are **not eligible for SPALs unless they are [also enrolled in SNAP E&T](#)**. Those who do volunteer to enroll in SNAP E&T may receive case management and SPAL support.

NEXT STEPS

1. Share and review this information with appropriate staff members.
2. Direct questions regarding this Operations Memorandum to your Area Manager.
3. This Operations Memorandum is in effect until further notice.

ATTACHMENT

Attachment - SNAP Work Requirement Verification Form ([PA 2000](#))