

**DATE:** Revised June 30, 2023  
JUNE 14, 2023

**OPERATIONS MEMORANDUM #23-06-03**

**SUBJECT:** Revised New Requirement to Inform Certain SNAP Recipients of Work Rules

**TO:** Executive Directors

**FROM:** Tanoa Fagan William Shabener  
Acting Director  
Bureau of Operations

**PURPOSE**

To inform County Assistance Offices (CAOs) of new rules applicable to SNAP work registrants effective as of the date of publication.

**BACKGROUND**

Per [SNAP HB 535.5](#), SNAP recipients who are work registrants are subject to three requirements known as the general work requirements. A work registrant must not voluntarily quit or reduce their hours at a job they currently hold, nor may they refuse to accept a *bona fide* offer of employment without good cause. Currently, the PA 600 includes language informing SNAP applicants/recipients of the general work requirements and a few major exemptions.

In addition, per [SNAP HB 536.1](#), some, but not all, work registrants are also considered Able-Bodied Adults without Dependents (ABAWDs). ABAWDs are limited to receiving SNAP for three countable months in a three-year period (known as the ABAWD time limit) unless the individual meets a 20 hour per week work requirement (see [SNAP HB 536.22](#)) or an exemption.

**DISCUSSION**

Due to new federal regulations, changes are being made to how all SNAP work registrants are notified of the general work requirements and, if applicable, the ABAWD time limit. **The CAO must provide each household with at least one work registrant with:**

- a consolidated written notice describing the work requirements each household member is subject to; **and**
- a verbal explanation describing the work requirements each household member is subject to.

### **Consolidated Written Notice of Work Requirements**

Effective April 17, 2023, the CAO must provide a consolidated written notice to each SNAP recipient household with at least one work registrant at:

- Application
- Renewal.
- When a change is reported during the certification period that causes at least one household member to become newly subject to a work requirement.

Effective April 17, the PA 772 has been converted into a consolidated written notice, and eCIS has been updated to automatically send the PA 772 in most instances. However, the CAO must generate a PA 772 in standalone and send centrally in the following circumstance:

- When a change is reported during the certification period that causes at least one household member to become newly subject to a work requirement **and** an eligibility or change/reduce notice is not generated by eCIS.

The PA 772 indicates which household members are work registrants subject to the general work requirements. In addition, for households with at least one ABAWD, the PA 772 contains an additional section indicating which household members are ABAWDs.

### **Verbal Explanation of Work Requirements**

The CAO must provide a comprehensive **verbal** explanation of all applicable work rules to households which appear to include at least one work registrant at:

- Application
- Renewal.
- When a change is reported during the certification period that causes at least one household member to become newly subject to a work requirement.

**NOTE:** Per [OPS 23-04-02](#), the requirement to interview households at application and renewal is waived through March 31, 2024. During this time, the CAO is **not** required to provide the verbal explanation of work requirements at application or renewal unless contacting (or contacted by) the household for another reason.

The CAO must **verbally** explain the following to the household:

1. Which of the work rules appear to be applicable to **each member** of the household;
  - a. Neither



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- b. Only the general work requirements
    - c. Both the general work requirements and the ABAWD time limit
  2. What is required by each applicable work rule;
    - a. General work requirements
    - b. ABAWD time limit (if at least one household member is an ABAWD)
  3. All exemptions which apply to each applicable work rule;
    - a. General work requirement exemptions are found in [SNAP HB 535.3](#)
    - b. ABAWD time limit exemptions are found in [SNAP HB 536.2](#)
  4. The consequences of failure to comply;
    - a. General work requirement sanctions are described in [SNAP HB 535.62](#)
    - b. The ABAWD three-month time limit is described in [SNAP HB 536.1](#)
  5. What the terms “exempt” and “good cause” mean, and how the household can verify exemptions or request good cause; and
  6. That the individual may voluntarily elect to participate in one of the SNAP Employment and Training (E&T) contractors in the area (see: [SNAP HB 535, Appendix B](#)) and may receive SPALs (see: [SNAP HB 535.4](#)) if eligible.

**NOTE:** While participation in SNAP E&T is voluntary and the general work requirements do not require an individual to participate in E&T, any adult SNAP recipient may volunteer to participate in E&T. In addition, ABAWDs may participate in E&T to satisfy the 20 hour per week work requirement.

## **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.