

Policy Clarification

Employment and Training- All - EPP-22328-535

Supplemental Nutrition Assistance Program- All - PFS-22328-535

Submitted: October 27, 2025

Agency: CAOs

Subject: Questions about Community Service and Supplemental Nutrition Assistance Program (SNAP) Work Requirements

Question: 1) Can Pennsylvanians with Employment or Engagement Requirements for SNAP (PEERs) combine hours of community service with hours of work and/or Employment and Training (E&T) to meet the 20 hour per week work requirement?

2) How does the County Assistance Office (CAO) calculate the community service hours for a household with multiple PEERs?

Example 1: A 22-year-old individual receiving \$292 per month of SNAP benefits attends community college less than half-time through SNAP Keystone Education Yields Success (KEYS). They participate in KEYS for seven hours per week, work an average of 10 hours per week earning \$12.00 per hour (\$120.00 gross weekly earnings), and volunteer at their church every Wednesday night for three hours running a youth group. Is this individual meeting the work requirement?

Example 2: A married couple receives \$546 per month of SNAP and are both subject to the PEERs work requirement. How many hours of community service would each need to meet the work requirement? Could one choose to do all the hours?

Response By: BEP

Date: October 27, 2025

1) Yes. There are two possible calculations for community service hours. The CAO will apply the calculation that results in the **lower** community service obligation.

Federal rules allow SNAP recipients to meet the work requirement through 20 hours per week of work, participation in a work program (such as SNAP E&T), or a

combination of the two. They also allow meeting the work requirement through “workfare” hours equal to the SNAP allotment divided by the minimum wage. While workfare hours cannot be combined with work and/or work program hours, community service can be considered a type of “unpaid work” rather than workfare when it is more beneficial to the SNAP household.

In **Example 1**, the CAO would use the number of hours per month (12) needed to reach the 20 hour per week work requirement when combined with the individual’s other work and work program hours, because it is lower than the number of hours per month (40) equal to the monthly SNAP allotment divided by the minimum wage.

When an individual volunteers to perform community service, the CAO will perform both calculations and use **the lower of the two**:

- A. Divide the household’s SNAP allotment by the minimum wage, then round down to the nearest whole number. In Example 1, the CAO would divide \$292 by \$7.25, equaling 40.3, which rounds down to 40 hours per month; or
- B. Subtract from 80 the monthly number of hours of other work and/or participation in a work program that the individual is or will be doing. In Example 1, the CAO would calculate that the individual is working 40 hours per month and participating in E&T for 28 hours per month, for a total of 68 hours per month combined. The CAO would then subtract 68 from 80 to determine the individual would need to perform an additional 12 hours per month of unpaid work (community service) to meet the work requirement.

The CAO must narrate which calculation was used. If the first calculation is lower, the CAO must narrate that the individual is meeting the work requirement through workfare and assign SNAP Qual Code 7. If the second calculation is lower, the CAO must narrate that the individual is meeting the work requirement through a combination of unpaid work and other types of work and/or work programs. The CAO would assign SNAP Qual Code 5 (if the individual is not being referred to SNAP E&T) or SNAP Qual Code 6 (if the individual is being referred to SNAP E&T).

NOTE: The CAO may use the PA 1938 to verify community service hours regardless of which calculation and SNAP Qual Code is used.

NOTE: For individuals meeting the work requirement through workfare, a SNAP E&T referral under project code SD, SN, or SA is required. For individuals to meet the requirement by combining paid and unpaid work, the CAO must still obtain verification, but a SNAP E&T referral is optional.

Citations: [7 CFR §273.24\(a\)\(1\)\(iii\)](#); [7 CFR §273.24\(a\)\(2\)\(iii\)](#); [7 CFR §273.24\(a\)\(2\)\(iv\)](#)

- 2) The household would need to perform 75 total hours of community service per month. This could be split between the two PEERs in any way they choose.

Workfare is a household responsibility. In a multi-PEER household or a mixed PEER/non-PEER household, the CAO must divide the entire household's allotment by the minimum wage to calculate the number of hours of service the household must perform to meet the Able-Bodied Adults without Dependents work requirement through the workfare calculation. In **Example 2**, $\$546/7.25 = 75$ hours per month.

There is no restriction on how this monthly obligation is divided between PEERs in a multi-PEER household. Therefore, in this example, one spouse could potentially choose to do all 75 hours, in which case both PEERs would meet the work requirement, and the CAO would assign Qual Code 7 to both.

NOTE: Federal rules restrict any individual PEER to no more than 120 hours per month of community service. In the rare instance that a household's obligation is more than 120 hours per month, a single PEER could not meet the entire household's obligation; the hours would need to be split.

Citations: [7 CFR §273.24\(a\)\(1\)\(iv\)](#); [7 CFR §273.7\(m\)\(5\)\(ii\)](#);
[7 CFR §273.7\(m\)\(6\)\(i\)\(A\)](#)