

Policy Clarification

Employment and Training- All - EPP-22327-535

Supplemental Nutrition Assistance Program - All - PFS-22327-535

Submitted: October 27, 2025

Agency: CAOs

Subject: Meeting Supplemental Nutrition Assistance Program (SNAP) Work Requirements through In-Kind or Unpaid Work

Question: Can individuals count hours of work that they are not paid for toward meeting the Pennsylvanians with Employment or Engagement Requirements for SNAP (PEERs) work requirement?

Example 1: A SNAP recipient is the superintendent of an apartment complex and his landlord allows him to live in an apartment (that would otherwise cost \$900 per month) in exchange for his services managing and maintaining the building. Is he meeting the work requirement?

Example 2: A 62-year-old SNAP recipient is retired but watches her eight-year-old grandchild (who does not live with her) for five hours a day, four days a week, so her adult daughter can work. Is she meeting the work requirement? Would the County Assistance Office (CAO) use the 20 hour per week work requirement or the community service calculation?

Response By: BEP

Date: October 27, 2025

Yes, both individuals are meeting the work requirement. The CAO must evaluate all work, including work for pay, work in exchange for goods or services (in-kind work), and unpaid work, when determining compliance with the SNAP work requirement.

In-Kind Work

The CAO must consider the hours worked in exchange for goods and services, as well as, when it can be verified, the value of the goods and services.

In **Example 1**, if the individual provided verification that the apartment unit would otherwise cost \$900 per month, the individual would be considered to have earnings of 30 or more times the minimum wage per week (\$870 per month), and the CAO would assign SNAP Employment and Training Program (ETP) Code 17 and SNAP Qual Code 3.

If the individual was unable to verify the value of the unit, or if the value did not equal at least \$870, the CAO would verify the hours the individual does building management and maintenance. If the individual were doing these tasks at least 20 hours per week, the CAO would assign SNAP ETP Code 30 and SNAP Qual Code 5.

Citations: [7 CFR 273.7\(b\)\(1\)\(vii\)](#); [7 CFR 273.24\(a\)\(2\)\(ii\)](#)

Unpaid Work

Hours of unpaid work can only be counted toward the community service calculation (SNAP allotment divided by minimum wage) if the work was being performed for a public or private non-profit organization, such as a 501(c)(3) or 501(c)(4) organization, a church or other place of worship, or a government agency.

Unpaid work can also include arrangements where an individual performs labor for a private person for whom they are not legally responsible and does not receive any compensation for doing so. This other type of unpaid work is not considered community service and is subject to the 20 hour per week work requirement, not the community service calculation.

The scenario described in **Example 2** does not meet that definition of community service but does meet the definition for other unpaid work. Therefore, the hours are unpaid work counted toward the 20 hour per week work requirement.

The CAO requires any verification that reasonably establishes the hours of unpaid work being performed, such as:

- A statement or collateral contact from the *person benefitting* containing:
 - Name of individual completing the work,
 - Frequency of work (how many hours and days per week),
 - Type of work being provided,
 - Their name and contact information (i.e., phone number).
- A statement or collateral contact from *another individual* containing:
 - Name of individual completing the work,
 - Frequency of work (how many hours and days per week),
 - Type of work being provided,

- Their name, relationship to the SNAP recipient (i.e. spouse, neighbor, sibling), and contact information (i.e. phone number).

In **Example 2**, the CAO could request the SNAP recipient provide a letter from her daughter stating that her mother is caring for her child to enable her to work. Once verified, the individual would be meeting the work requirement through unpaid work.

The CAO will enter SNAP ETP Code 2 and Qual Code 5 on the Individual Attributes screen in the Electronic Client Information System and add an unearned income screen utilizing income code “other” with the source description as “unpaid work: childcare” while setting the income for the representative month at \$0.00, and narrate all actions taken.

Citations: [7 CFR 273.24\(a\)\(2\)\(iii\)](#); [7 CFR 273.7\(m\)\(3\)\(ii\)](#)