

2015

Guide to Serving ABAWDs Subject to Time-limited Participation

*A Guide on Serving
Able-Bodied Adults
without Dependents
(ABAWDs)*



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Introduction

The purpose of this guide is to consolidate guidance and policy on serving able-bodied adults without dependents (ABAWDs). State agencies responsible for implementing the Supplemental Nutrition Assistance Program (SNAP) may use this guide to better understand the requirements and dynamics of enforcing ABAWD work requirements. This guidance is based on relevant sections of the Food and Nutrition Act (the Act), as amended, and title 7 of the Code of Federal Regulations, part 273.

The Food and Nutrition Service (FNS) acknowledges the complexity of regulations related to serving ABAWDs. In order to ensure accuracy, State agencies must have the system functionality in place to track all requirements and ensure that benefits are issued according to SNAP rules. Systems are needed to track all aspects of the ABAWD time limit, including the 36-month period, 3 countable months, additional 3-month eligibility and 15 percent exemptions, as described in this guide.

Background

What is an ABAWD?

An ABAWD is an able-bodied adult without dependents. ABAWD eligibility for SNAP is limited to any 3 months in a 36-month period (considered the 3-month time limit) unless the individual meets the ABAWD work requirements (defined below). The 3-month time limit does not apply to individuals who are: 1) under 18 or 50 years of age or over; 2) medically certified as physically or mentally unfit for employment; 3) responsible for a dependent child or residing in a household where a household member is under age 18; 4) exempt from SNAP work requirements; or 5) pregnant. All other SNAP participants are considered ABAWDs.

What is the ABAWD Work Requirement?

ABAWDs can meet the work requirement by:

- Working 20 or more hours a week, averaged monthly;
- Participating in and complying with the requirements of a work program (see definition below) for 20 or more hours a week; or
- Participating in and complying with the requirements of a workfare program under section 20 of the Act or a comparable program established by a State or a political subdivision of a State (see “Qualifying Components & Activities” below).

ABAWDs who exhaust their 3 months of benefits and do not comply with the work requirement lose their benefits for the remainder of the 36-month time period. An ABAWD can regain eligibility during this time period by meeting the work requirement for 30 days, after which they remain eligible to receive SNAP for as long as they continue to meet work requirements.

The ABAWD work requirement does not apply to ABAWDs who reside in areas of a State that are granted a waiver of the 3-month time limit by FNS or to ABAWDs who are included in a State agency’s 15 percent exemption allowance. However, these ABAWDs are still subject to general SNAP work requirements and must participate in a training or workfare activity if referred by the State agency.

What is a work program?

In the context of ABAWD requirements, a work program means:

- A program under the Workforce Investment Act (WIA)
- A program under section 236 of the Trade Act of 1974
- An employment and training program, other than a job search or job search training program, operated or supervised by a State or political subdivision of a State that meets standards approved by the Governor of the State, including activities under the SNAP Employment and Training (E&T).

What is the difference between the additional ABAWD requirements and general SNAP work requirements?

SNAP participants who are not specifically exempted by law are subject to work requirements as a condition of eligibility. ABAWDs are a subset of this population and must meet additional requirements in order to continue receiving SNAP benefits beyond the 3-month time limit. ABAWDs must meet all the general SNAP work requirements (like registering for work and not voluntarily quitting a job) as well as the additional requirements for ABAWDs. The table below compares general SNAP work requirements to the additional responsibilities placed on ABAWD participants only.

	General SNAP Work Requirements	Additional ABAWD Requirements
The requirements do not apply to SNAP participants who are:	<ul style="list-style-type: none"> • Under the age of 16 or over the age of 60; • Physically or mentally disabled; • Complying with the work requirements of another program; • Responsible for a child under the age of six; • Already working more than 30 hours a week; • Participating in a drug or alcoholic rehab program • Students enrolled at least half time 	<ul style="list-style-type: none"> • Exempt from general SNAP work requirements; • Under 18 or age 50 or over; • Living in a household with a child under 18; • Physically or mentally unfit for employment; • Pregnant
Activities that meet the requirements are:	<ul style="list-style-type: none"> • Register for work; • Participate in an SNAP E&T program to the extent required (up to 120 hours); • Participate in workfare if assigned; • Accept suitable employment if offered; and 	<ul style="list-style-type: none"> • Working 20 or more hours a week, averaged monthly; • Participating in a work program for 20 or more hours a week ; •Combination of working and participating in a work program for 20 or more hours

	<ul style="list-style-type: none"> Do not voluntarily quit a job of 30 or more hours a week or reduce work effort to less than 30 hours per week 	per week; or <ul style="list-style-type: none"> Participating in a workfare program
The penalty for a failure to comply with the requirements is:	Ineligible for SNAP benefits, anywhere from one month to indefinitely depending on number of occurrences and State policy.	Ineligible for SNAP for the remainder of a 36-month period after exhausting the 3-months of time limited eligibility.

Countable Months

ABAWD eligibility is time limited to 3 months in any 36-month period in which the ABAWD is subject to but not complying with ABAWD work requirements. State agencies must track an ABAWD’s countable months in order to correctly determine his or her eligibility for SNAP. State systems must be able to track the 3 countable months, the 36-month time period as described in this section, and the additional 3 months of eligibility explained in the following section titled “Regaining Eligibility.”

A countable month is any month in which an ABAWD receives SNAP benefits for the full benefit month while not:

- Exempt from the 3-month time limit
- Fulfilling ABAWD work requirements
- Covered by a waiver of the ABAWD time limit
- Exempted for the month using one of the State’s 15 percent exemptions

How do States track countable months?

Tracking countable months requires careful measurement. FNS encourages States to consider how they will utilize their eligibility systems to accurately track ABAWD participation and countable months.

State systems must measure:

- The 3 countable months of SNAP participation
- The 36-month time period
- The additional 3 months of eligibility (explained in the section titled “Regaining Eligibility”)

The 3 countable months of SNAP participation do not have to be used consecutively. Individuals may find sufficient employment temporarily, cease to participate in the program for a period of time or experience other circumstances that may cause them to use their 3 months of time limited eligibility during non-consecutive months.

Non-consecutive countable months

The table below provides a visual example of countable months that are not consecutive. In this example, the individual is participating in SNAP for the entire 36-month period. The first countable

month is January of Year 1 (as indicated by “M1”). Later, the individual participates in a qualifying work activity and finds work for an average of at least 20 hours per week.

Example 1: Non-consecutive use of countable months

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Year 1	M1	ET	ET	ET	W	W	W	W	W	W	W	W
Year 2	W	W	W	W	M2	W	W	W	W	M3	ET	W
Year 3	W	W	W	W	W	W	W	W	W	W	W	W

W = Working at least 20 hours; **ET** = Participating in qualifying work activity;
M1, M2, M3 = Countable month

Breaks in participation and countable months

State agencies must track countable months over the 36-month period even if there are breaks in an ABAWD’s participation. When an individual has used his or her countable months and is not meeting the ABAWD work requirements, he or she is not eligible for SNAP benefits. An example is illustrated in the table below. This example shows an individual who has non-consecutive countable months as well as breaks in participation.

Example 2: Non-consecutive use of countable months with breaks in participation

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Year 1	M1	ET	ET	ET	W	W	W	W	N	N	N	N
Year 2	W	W	W	W	M2	W	W	W	W	M3	ET	W
Year 3	W	W	W	W	W	I	I	I	I	I	I	I

W = Working at least 20 hours; **ET** = Participating in qualifying work activity;
M1, M2, M3 = Countable month; **N** = Not participating in SNAP; **I** = Ineligible for SNAP because ABAWD is not meeting work requirements and has used countable months.

Countable months and the full benefit month

A countable month is any month in which an ABAWD receives SNAP benefits for the full benefit month while not meeting or exempt from ABAWD work requirements. Any month in which an ABAWD does not receive a full month of benefits cannot be considered a countable month. For example, if benefits are prorated during the month of application, that initial month would not be a countable month. The example below expands upon Examples 1 and 2 by showing the countable months for an individual who is issued a partial month of benefits.

Example 3: Non-consecutive use of countable months with prorated benefits

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Year 1	M1	ET	ET	ET	W	W	W	W	N	N	N	N
Year 2	P	W	W	W	M2	W	W	W	W	M3	ET	W
Year 3	W	W	W	W	W	I	I	I	I	I	I	I

W = Working at least 20 hours; **ET** = Participating in qualifying work activity;
M1, M2, M3 = Countable month; **N** = Not participating in SNAP; **I** = Ineligible for SNAP because ABAWD is not meeting work requirements and has used countable months.
P=Partial month of benefits.

Measuring the 36-Month Period

States may use a fixed or a rolling clock to measure the 3-year period, as long as the policy is applied consistently across the State and the State notifies FNS of what tracking method it is using. Regardless of which method is used, States may not consider participation prior to October 1, 2010, in determining countable months, following provisions of the American Recovery and Reinvestment Act of 2009 (ARRA).

What is the difference between a fixed and rolling clock?

Fixed Clock	Rolling Clock
<ul style="list-style-type: none"> Has a definite start and stop date. Starts on a given date and runs continuously for 3 years. State can opt to use individual periods or the same 3-year period for everyone. 	<ul style="list-style-type: none"> Does not have a definite start and stop date. Looks back 3 years on the date of application and each month thereafter.
<p><i>Example of individual periods:</i> The 3-year period starts on the participant’s date of application. The participant’s slate is wiped clean 3 years from the date of application and a new 3-year period begins.</p> <p><i>Example of the same period for everyone:</i> All participants have the same, fixed 3-year period. At the end of the 3 years, everyone’s slate is wiped clean and the new 3-year period begins.</p>	<p><i>Example:</i> If an individual applies on January 1, 2014, the worker must look back to January 1, 2011 to measure any countable months during that 3-year period. The following month, February 1, 2014, the worker will look back to February 1, 2011 to measure the participant’s countable months.</p>

What information are ABAWDs required to report?

SNAP regulations require that all ABAWDs report when their work hours fall below 20 per week, averaged monthly, regardless of the reporting system. State agencies must notify households of this reporting requirement and ensure that they have a way to track countable months for participants who are subject to ABAWD work requirements.

Regaining Eligibility

ABAWDS who have exhausted their 3 countable months may regain eligibility at any time by meeting ABAWD work requirements for 30 consecutive days, meeting an exemption from ABAWD work requirements or when their 3-year period expires. The State agency has the option to reinstate the eligibility of ABAWDs who can verify that they will meet ABAWD work requirements within 30 days from the date of application.

There is no limit on how many times an ABAWD may regain eligibility. Once the ABAWD is proven to be eligible for program participation, benefits must be prorated from the date they regained eligibility.

What happens if an ABAWD who has regained eligibility stops meeting the work requirement?

SNAP regulations provide that in limited circumstances, ABAWDs can gain an additional 3 months of eligibility. This provision:

- Applies only to ABAWDs who regained eligibility but are no longer fulfilling the work requirement.
- **Provides that ABAWDs may only take advantage of this provision once in a 3-year period.**
- **The additional 3 months must be used consecutively.**
- If the individual was working, the consecutive 3 months must start when the participant notifies the State agency that he or she is no longer in compliance with ABAWD work requirements.
- If the individual was participating in a work program or workfare program, the consecutive 3 months must start when the State determines the ABAWD is no longer in compliance.

States must be able to track the 3 additional months of eligibility to ensure that they are used consecutively and only once in the 3-year period. An example of the use of the 3 additional months of eligibility is illustrated in the table below.

Example 4: Regaining eligibility and the additional 3 months of eligibility

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Year 1	M1	ET	ET	ET	W	W	W	W	N	N	W	W
Year 2	P	W	W	W	M2	W	W	W	W	M3	W	W
Year 3	W	A1	A2	A3	W	W	I	I	I	W	W	W

W = Working at least 20 hours; **ET** = Participating in qualifying work activity;
M1, M2, M3 = Countable month; **A1, A2, A3** = Additional months of eligibility;
N = Not participating in SNAP; **I** = Ineligible for SNAP because ABAWD is not meeting work requirements and has used countable months; **P**=Partial month of benefits.

15 percent Exemptions

What are 15 percent exemptions?

The Act provides that each State agency be allotted exemptions equal to 15 percent of the State's caseload that is ineligible for program benefits because of the ABAWD time limit. These exemptions allow the State agency to extend SNAP eligibility to ABAWDs who would otherwise be ineligible because of the 3 in 36 month time limit. Each 15 percent exemption extends eligibility to 1 ABAWD for 1 month.

States do not earn exemptions in areas that are covered by ABAWD time limit waivers. FNS considers a State's ABAWD time limit waiver status as of approximately July 1 of each year when allotting annual exemptions.

How can States use 15 percent exemptions?

State agencies have maximum flexibility to apply the exemptions as they deem appropriate. However, along with this flexibility, State agencies have the responsibility to develop exemption policies that support the number of exemptions they are allotted.

State agencies may also decide whether or not to require an ABAWD to exhaust the 3-month time limit in order to qualify for an exemption. For example, if a State agency has a sufficient number of 15 percent exemptions available, it may choose to exempt all ABAWDs residing in area not under a waiver, regardless of whether ABAWDs have exhausted their 3 months of eligibility. On the other hand, a State agency may determine that the best way to manage its finite number of 15 percent exemptions is to require individuals to exhaust their 3 months of eligibility before using a 15 percent exemption. FNS encourages the latter practice to reduce the risk that a State agency will exceed its allocation.

Are State agencies required to track the number of 15 percent exemptions they use?

State agencies are required to track the number of exemptions they use. The State agency reports the exemptions it uses on the FNS 583 form each quarter. Exemptions do not expire and State agencies can carry over unused exemptions from year to year. The FNS national office provides data annually on the number of exemptions each State has used and the new exemptions earned by each State agency during the year.

What happens if a State agency uses more than exemptions than it has to give?

If a State agency issues ABAWD exemptions in excess of its annual allocation, including those carried over, FNS considers the benefits issued as unauthorized allotments. On March 8, 2008, FNS issued guidance to all Regional Directors detailing the actions to be taken in response to the overuse of 15 percent exemptions. In instances where a State agency has issued exemptions in excess of its allotted amount, FNS will allow the State to deduct the overused exemptions from the subsequent year's allotment. If the State does not earn enough 15 percent exemptions during the subsequent year to cover the overuse, FNS will bill the State agency for the unauthorized benefits it provided.

ABAWD Time Limit Waivers

A State or area(s) within a State may qualify for a waiver of the ABAWD time limit if it has an unemployment rate of over 10 percent or does not have a sufficient number of jobs. The State agency may submit whatever data it deems appropriate to support its waiver request to FNS. States typically submit the following kinds of documents and data to support ABAWD waiver requests:

- Data that shows a recent 12-month average unemployment rate over 10 percent.
- Data that shows a recent 3-month unemployment rate over 10 percent.
- Evidence of a historical seasonal unemployment rate over 10 percent.
- Evidence that the area has been designated a Labor Surplus Area for the current fiscal year by the Department of Labor (DOL).
- Evidence that the the DOL's Department of Unemployment Insurance Service has qualified the State for extended unemployment benefits.
- Evidence that the State has a low and declining employment to population ratio.
- Data that shows the State has a 24-month average unemployment rate that is 20 percent above the national average for the same period (the 24-month period must begin no earlier than the date DOL uses to designate Labor Surplus Areas for the fiscal year).

All data submitted as part of an ABAWD time limit waiver request must come from an acceptable source. Unemployment data must be from the DOL Bureau of Labor Statistics (BLS). For territories that the BLS does not study, FNS will accept unemployment data generated by a State cooperating agency that relies on BLS methods. If the State uses census share data in its request, the data must come from the Census Bureau. Any calculations the State does to provide evidence that it qualifies for an ABAWD time limit waiver should be documented and included along with its waiver request.

Typically, ABAWD time limit waivers are granted for a 1-year period. States may choose to implement 1-year waivers for a shorter time period if they notify FNS in advance. A State or area may qualify for a 2-year waiver if it meets any of the following criteria:

- An unemployment rate greater than 10 percent for the 2-year period immediately prior to the request.
- Designation as a labor surplus area by DOL for a minimum of two consecutive fiscal years (the year of the request and the fiscal year prior to the request).
- An unemployment rate greater than 20 percent above the national average for a 36-month period, ending no earlier than 3 months prior to the request.

Qualifying Components & Activities

What activities qualify as work programs?

ABAWDs may fulfill the ABAWD work requirement by participating in a work program for 20 hours a week. Work programs include WIA activities, activities under section 236 of the Trade Act, and SNAP E&T activities or equivalent State or local programs.

The rules and requirements of activities vary. Most notably, there is no restriction on the number hours dedicated to job search in WIA and Trade Act program while other training programs must limit job search activities to less than half (10 hours) of the 20-hour requirement.

Another important distinction is that the 20-hour requirement does not apply to workfare components of E&T programs or optional workfare programs under section 20 of the Act. State agencies determine the hourly requirement for workfare by dividing a household’s SNAP allotment by the higher of the applicable Federal or State minimum wage. This calculation produces the number of work hours required per month.

Workfare is a household responsibility, meaning that all non-exempt household members can share the hourly obligation over the course of a month. For example, a two-person household receiving \$200 in SNAP benefits per month and living in a State where the minimum wage is \$7.25 is limited to a maximum of 27 hours per month ($\$200 \div \$7.25 = 27.58$ or 27 hours). The State agency may apportion the hours between household members as it sees fit. However, it cannot require them to work beyond that maximum.

The following chart outlines qualifying work programs and hourly requirements.

Qualifying Component	Description	Hours required	Funding
WIA programs	Can include job search, occupational skills training, on-the-job training, job readiness training, adult education and literacy activities, etc.	20 hours	Department of Labor
A program under section 236 of the Trade Act of 1974	Training programs for workers that have lost or may lose their jobs	20 hours	Department of Labor
SNAP E&T education or training	Can include basic education, vocational or technical training, on-the-job training. Job search activities must be less than half of required hours. Activities must be described in State SNAP E&T Plan.	20 hours, alone or combined with other activities	SNAP E&T funds

Qualifying Component	Description	Hours required	Funding
SNAP E&T work experience	Placements at public and private sector employers. Can include for-profit employers. Activities must be described in State SNAP E&T Plan.	20 hours, alone or combined with other activities. Mandatory unpaid work hours equal to the result obtained by dividing a household's SNAP allotment by the higher of the applicable Federal or State minimum wage.	SNAP E&T funds
SNAP E&T workfare	Placements at public, non-profit employers. Activities must be described in State SNAP E&T Plan.	Hours equal to the result obtained by dividing a household's SNAP allotment by the higher of the applicable Federal or State minimum wage.	SNAP E&T funds
Optional workfare programs	Workfare programs operated by political subdivisions outside of the SNAP E&T program. Political subdivisions include any county, city, town or parish. Political subdivisions must submit workfare plans to State agencies and FNS.	Hours equal to the result obtained by dividing a household's SNAP allotment by the higher of the applicable Federal or State minimum wage.	Local and/or State government funding and 50 percent Federal reimbursement. State may not use 100 percent E&T grant. Political subdivisions are eligible for workfare savings ¹
Voluntary workfare	There is no disqualification for a failure to comply when a participant volunteers for workfare. May be operated by the State agency or local political subdivisions. Activities must be described in a workfare plan.	Work hours are negotiated between State and household. Cannot exceed hourly requirements of mandatory workfare programs.	Same as optional workfare programs

¹ Workfare savings refer to the reduction in benefits that occurs when a workfare participant begins employment while participating in workfare for the first time or within thirty days of ending his or her first participation in workfare. A political subdivision is entitled to 150 percent of the value of the benefits reduction.

Qualifying Component	Description	Hours required	Funding
Comparable workfare programs	Similar to other workfare options except ABAWDs may be responsible for finding their own public service placement. The ABAWD is responsible for arranging to have their participation reported to the local SNAP office and for verifying hours. May be operated by the State agency or local political subdivisions.	May use a range or SNAP allotments and corresponding fixed participation hours. The maximum hours worked weekly, combined with any other hours worked for compensation, must not exceed 30 hours per week.	Same as optional workfare programs

Is job search a qualifying component?

E&T job search or job search training components are not qualifying activities for ABAWDs. However, job search or job search training activities, when offered as part of other E&T components, are acceptable as long as those activities comprise less than half of the total required time spent in the components.

In addition, State agencies may establish a job search period of up to 30 days following initial SNAP certification prior to making a workfare assignment. This job search activity is part of the workfare assignment. Therefore, participants are considered to be participating in and complying with workfare requirements during this job search period and are meeting the ABAWD work requirement. The job search period may only be conducted at certification, not at recertification.

Job search activities that are included in WIA or Trade Act programs are allowable.

Is there a limit on the number of hours a State agency can require an ABAWD to participate in a training or work program?

Yes, there is a limit on the number of hours a State agency can require an ABAWD to participate in a training or a work program. ABAWDs can meet the work requirement by working 20 hours per week, complying with a work program for 20 hours per week, or any combination of working and a work program for 20 hours a week, or by participating in workfare. The State agency cannot require an ABAWD to participate in a work program for longer than the 20 hours needed to fulfill the requirement and the State cannot increase the ABAWD work requirement.

However, if the State has referred the ABAWD to a SNAP E&T program in order to fulfill the ABAWD work requirement, the E&T program may require additional hours of participation. The total hours of individual participation in E&T, together with any hours worked for compensation in cash or in-kind (including workfare/work experience) cannot exceed 120 hours per month. Participants may volunteer for additional hours of training.

E&T Pledge Funds

The Act provides \$20 million each fiscal year for State agencies that pledge to offer a qualifying SNAP E&T component to all at-risk ABAWDs. At-risk ABAWDs are those who are in their third countable month and at risk of losing their SNAP eligibility due to the time limit. Eligible State agencies are ones that commit to offer a qualifying education, training, or workfare opportunity to every ABAWD applicant or recipient (not waived or exempted) who is in the last month of the 3-month period of eligibility and to provide such an opportunity to those ABAWDs who accept the offer.

A State agency interested in receiving additional funding for serving ABAWDs subject to the 3-month time limit must include in its State E&T Plan:

- Its pledge to offer a qualifying activity to all at-risk ABAWD applicants and recipients;
- Estimated costs of fulfilling its pledge;
- A description of management controls in place to meet pledge requirements;
- A discussion of its capacity and ability to serve at-risk ABAWDs;
- Information about the size and special needs of its ABAWD population; and
- Information about the education, training, and workfare components it will offer to meet the ABAWD work requirement.

As part of the plan approval process, FNS will review each interested State agency's request based on the information provided. If the information clearly indicates that the State agency will be unable to fulfill its commitment, FNS may require the State agency to address its deficiencies before it is allowed to participate as a pledge State.

The Transition off of a Statewide ABAWD Limit Waiver

Most States have qualified to operate under Statewide waivers of the ABAWD time limit since 2008 because of high unemployment rates. As the economy improves, Statewide waivers will expire and States will be required to re-establish the 3-month time limit. FNS strongly encourages the following steps in planning for this transition:

- 1) Assess the need:
 - ✓ Estimate number of potentially at-risk ABAWDs in the State or affected counties
- 2) Evaluate what qualifying components already exist:
 - ✓ WIA programs or Trade Act programs
 - ✓ SNAP E&T components
 - ✓ Workfare or voluntary workfare
 - ✓ Other training programs that meet State standards
- 3) Examine the capacity of existing programs to meet the need:
 - ✓ How many people do existing programs serve?
 - ✓ How many ABAWDs will need a work program?
 - ✓ Can the existing programs meet this need?
- 4) Consider State system and operational requirements:
 - ✓ How will the State track countable months?
 - ✓ How will the State track the 36-month period?
 - ✓ How will the State track use of the additional 3 months of eligibility?
 - ✓ Can the State note which SNAP recipients are subject to and in compliance with ABAWD requirements?
 - ✓ Will the State use a fixed or rolling clock to track countable months?
 - ✓ Will the State assign shorter certification periods to households that contain ABAWDs?
 - ✓ Staff training
 - ✓ How many exemptions does the State have?
 - ✓ How will the State use 15 percent exemptions?
 - ✓ How will it track 15 percent exemptions used? States must be able to report exemptions used each quarter on the FNS 583 form.
 - ✓ How will time-limited participation and ABAWD work requirements be communicated to affected SNAP participants?
- 5) Check the number of 15 percent exemptions and develop a strategy for their use:
 - ✓ State agencies with a sufficient number of 15 percent exemptions may use them to exempt all ABAWDs from the time limit until the next contact with the household. For Quality Control purposes, the exemption must be documented prior to monthly sample selection.

- ✓ State agencies with a zero balance of 15 percent exemptions may also grant 15 percent exemptions, provided that the State has carefully estimated the number it will earn for the subsequent Fiscal Year and is confident that it will fully offset the overuse.

NOTE: If the State does not earn enough 15 percent exemptions for the subsequent fiscal year to fully offset the overuse, FNS will bill the State agency for the unauthorized benefits it has provided (see bottom of page 8).

6) Long-term activity - consider future opportunities:

- ✓ Add SNAP E&T components or offer in new locations
- ✓ Work with private and public entities to establish workfare or work experience placements.