



U.S. DEPARTMENT OF AGRICULTURE

Assessing SNAP Participants' Fitness for Work

Final Report



August 2024

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Executive Summary

The Supplemental Nutrition Assistance Program (SNAP), administered by the U.S. Department of Agriculture’s Food and Nutrition Service (FNS), requires households to meet certain work requirements to remain eligible for benefits. SNAP participants ages 16 to 59 are subject to the general work requirements, which require individuals to register for work, participate in SNAP employment and training (E&T) or workfare if assigned by the State agency, take a suitable job if offered, and not voluntarily quit a job or reduce work hours below 30 a week without a good reason. In addition to the general work requirements, a subset of participants who are not exempt from the general work requirements—adults ages 18 to 54 who are not disabled and live in households without dependents called able-bodied adults without dependents (ABAWDs)—are subject to a three-month time limit in a 36 month period on receipt of SNAP benefits unless they work or participate in a work program or a combination of the two, for 20 hours per week or averaged monthly for at least 80 hours per month.^{1,2} An applicant or participant may be excused from the general or ABAWD work requirement for several reasons, including being unable to work due to physical or mental limitations.

While FNS provides guidance on who can be excused from the general and ABAWD work requirements, State agencies have some discretion in applying exemptions from the general work requirements and exceptions from the ABAWD work requirements. This entails how eligibility workers determine whether an applicant or participant is unable to work due to a physical or mental limitation, including the type of verification required and questions asked in eligibility interviews. In addition to exemptions and exceptions from the work requirements, State agencies may determine that participants who are not excused from the general work requirement, known as work registrants, or ABAWDs who do not comply with work requirements may have good reason for their noncompliance, also known as good cause determinations. Good cause determinations are made when an individual who is subject to work requirements fails to comply with work requirements due to circumstances beyond the individual’s control. In contrast, eligibility staff determine if an individual should receive an exemptions or exceptions during the application and recertification process. Acceptable reasons for not complying with work requirements include, among others, lack of transportation or childcare, illness, or other circumstances beyond the individual's control. If the State agency determines that a SNAP recipient has good cause for not complying with work requirements, they may re-screen that individual to see if they should receive an exemption or exception.

This study sought to better understand how State agencies determined whether individuals were excused from the general and ABAWD work requirements or had good cause for not meeting work requirements due to physical or mental limitations. Specifically, the study was designed to meet four objectives shown below.

- **Objective 1:** Document the policies and guidelines used for making fitness for work determinations by all 53 SNAP State agencies.
- **Objective 2:** Describe the process States used for making fitness for work determinations.

¹ As of October 1, 2024, the age of those subject to the ABAWD time limit increased to age 18-54. The age limit for those subject to the ABAWD time limit prior to the June 3, 2023, Fiscal Responsibility Act of 2023 was 18-49.

² Work can include volunteering and in-kind work. Work programs can include E&T, a program under the Workforce Innovation and Opportunity Act (WIOA), a program under section 236 of the Trade Act of 1974, or a program of employment and training for veterans operated by the Department of Labor or the Department of Veterans Affairs. Individuals can also participate in a workfare program for the number of hours assigned each month by the State agency.

- **Objective 3:** From analysis of administrative data and data on community characteristics from the United States Census Bureau, determine if there were any general patterns and trends in fitness for work and good cause determinations within and across four case study States.
- **Objective 4:** For each of the four case study States, determine how closely caseworkers followed the State’s fitness for work and good cause determination policies and requirements and the challenges they face in applying the policy.

1. Study Approach

The study had several data collection activities:

- **Survey of 53 State agencies.** The study team fielded a survey of SNAP State agencies from October 2022 to March 2023. The survey consisted of three sections that asked about: (1) the State agency’s processes, policies, and procedures to determine whether an applicant is excused from general and ABAWD work requirements due to physical and mental limitations; (2) the State agency’s processes, policies, and procedures to determine whether an applicant had good cause for not meeting general and ABAWD work requirements; and (3) the State agency’s processes, policies, and procedures to determine exemptions from mandatory E&T requirements for a subset of States with mandatory E&T programs. The study team obtained a response rate for the survey of 94 percent with 48 State agencies fully completing the survey and two State agencies partially completing the survey. State agencies were also asked to upload non-public documents, including training materials, desk guides for eligibility workers, and notices of consolidated work requirements for participants. Findings from the documents were used to supplement survey responses.
- **In-depth case studies.** The study used a mixed methods design to produce in-depth case studies of four States (Georgia, Maryland, Texas, Wisconsin). For the qualitative component, the study team conducted (1) a document review of SNAP policy manuals, E&T guides, and other State-level documents; and (2) semi-structured interviews with State and local SNAP office staff and E&T providers. Interviews took place virtually and in-person between October and December 2023. The quantitative component included analysis of State administrative records on determinations around work requirements at initial SNAP application and at recertification.

2. Case Study States

The four States selected for the case study—Georgia, Maryland, Texas, and Wisconsin—were chosen to reflect a variety of characteristics (e.g., geographic diversity, mandatory versus voluntary E&T program) and approaches to making fitness for work and good cause determinations. Table ES.1. presents an overview of key State characteristics.

Table ES.1. Overview of Case Study States

Characteristic	Georgia	Maryland	Texas	Wisconsin
FNS Region	Southeast	Mid-Atlantic	Southwest	Midwest
Mandatory vs. Voluntary E&T	Voluntary	Voluntary	Mandatory	Voluntary
County vs. State administered	State	State	State	County

3. Key Findings

This section summarizes key findings from the survey of State agencies, document review, and four case studies.





Policies and Guidelines






The survey findings revealed that most State agencies relied on federal regulation, statute, or guidance when updating their policies and procedures surrounding exemptions, exceptions, and good cause determinations. State SNAP agencies most frequently communicated their policies to staff through trainings and policy manuals.

Process for Making Fitness for Work Determinations

There was some variation in the screening process for physical and mental limitations across State agencies. Exhibit ES.1 provides a summary of the process for making fitness for work determinations in each of the case study States.

Exhibit ES.1. Summary of Fitness for Work Determinations by Case Study State

	 Georgia	 Maryland	 Texas	 Wisconsin
Application	Individuals not explicitly asked about disability on application.	Application asked if anyone in household is disabled.		Application asked if anyone in household is unable to work because of illness or injury.
	Certain information was asked on application that could indicate disability (e.g., receiving disability income).			
Interview	Eligibility workers determined fitness for work during eligibility interview. Staff probed on certain topics (e.g., housing) to identify any limitations.	State did not require interviews at the time of the site visit.		
Verification	Individuals automatically granted exemptions or exceptions if receiving disability benefits.			
	Verification (e.g., doctor's note) required if limitation was not obvious.	Some offices always required verification, while others only required verification if limitation was not obvious.	Verification (e.g., medical form, physician's statement) was always required.	Verification (e.g., doctor's note) required if limitation was not obvious.
Determination	Eligibility workers made final determination on exemptions and exceptions.	Eligibility workers made final determination on exemptions and exceptions.	Eligibility system automatically made exemption or exception determination based on information eligibility workers entered into the system.	Eligibility workers made final determination on exemptions and exceptions.

	 Georgia	 Maryland	 Texas	 Wisconsin
Recertification	The process for making fitness for work determinations at recertification did not vary from the application process.			
 Appeals	Applicants submitted a request for appeal if they did not agree with fitness for work determination. A separate department oversaw making final determination on appeals.			

Within State agencies, the process for determining exemptions from the general work requirement and exceptions from the ABAWD work requirement generally did not differ.

Findings from the survey revealed that within each State, the screening process for making exemptions from the general work requirements and exceptions from the ABAWD work requirements were generally the same. This included the staff involved in making the determination, types of physical and mental limitations considered, when individuals were first asked about limitations, and when participants could have their exemption or exception status reassessed.

Allowing staff discretion in making fitness for work determinations was more common than allowing local variation. State agencies intended for policies and guidelines to be applied uniformly throughout the State. In the survey, few State agencies allowed for local variation in the populations that eligibility workers screened for exemptions or exceptions (0 percent for the general work requirement, 4 percent for ABAWD work requirement), types of verification that was allowed (6 percent for general work requirement and 10 percent for ABAWD work requirement), or the physical or mental limitations considered (14 percent for general and ABAWD work requirement). However, over half of State agencies (56 percent) allowed staff to use discretion in the types of physical or mental limitations that eligibility workers could consider when determining exemptions or exceptions.

Three of the four case studies allowed for some discretion among eligibility workers while making determinations, which revealed some challenges. In Georgia and Wisconsin, staff discussed that there were inconsistencies between eligibility workers who made determinations. In addition, some Maryland eligibility workers expressed a desire for a more standardized and straightforward process for making fitness for work determinations because of physical or mental limitations. Staff in Texas did not have as much discretion because eligibility workers always required verification for physical and mental limitations, taking any decision-making around physical or mental limitations out of the eligibility workers' hands.

State agencies usually first asked about physical and mental limitations on the applications.

In the survey, about two-thirds of State agencies (66 percent for general work requirements and 62 percent for ABAWD work requirements) reported that applicants were first asked about physical or mental limitations on the application. Findings from the case studies revealed some variation in whether applicants were asked about physical or mental limitations on the application and how much information from the application was considered while making determinations. For example, the Georgia SNAP application did not explicitly ask about disabilities or fitness for work, and exemptions and exceptions were usually determined during the interview. Meanwhile, Wisconsin eligibility workers almost exclusively relied on information from the application when making determinations.

Interview processes for screening for physical or mental limitations did not differ based on if the interview was conducted over the phone or in-person. At the time of the survey, most State agencies (96 percent) reported that they did not require face-to-face interviews as part of the SNAP application process. Of the State agencies that did not require face-to-face interviews, most (80 percent) indicated that the process for screening individuals for mental or physical limitations did not differ regardless of if applicants interviewed face-to-face or not. However, eligibility workers in Georgia noted that fitness for work determinations were harder to determine over the phone since limitations were not as easily visible.

Case study States highlighted the importance of using certain interview probes to identify physical and mental limitations and ensure consistency in determinations. Maryland staff proposed adding a set of questions to their eligibility system so that during interviews, they would know what to probe on related to barriers to working (e.g., problems with mobility). Not only would this have helped identify mental or physical limitations, it would have also ensured consistency across eligibility workers. Georgia eligibility workers noted the importance of probing on applicants' housing situations because being homeless often coincides with having a physical or mental limitation.

Verification for physical and mental limitations was most often required when the limitation was unclear. Survey findings revealed that most State agencies reported sometimes requiring verification of physical and mental limitations, regardless of interview mode (84 percent for face-to-face and 71 percent for non-face-to-face). State agencies that reported verification was sometimes required most commonly reported requiring verification if the severity of the limitation or functional limitations of the client's condition was unclear, regardless of mode (64 percent for face-to-face interviews and 60 percent non-face-to-face interviews). Among those who always required verification for physical or mental limitations, a larger percent reported doing so to grant exemption or exceptions for applicants who did not complete a face-to-face interview (25 percent) than those who did (10 percent).

Requiring or encouraging verification of physical or mental limitations was one way to encourage consistency and reduce staff burden. In Texas, staff noted that their process for making fitness for work determinations was "cut and dry" since eligibility workers almost always required verification for physical and mental limitations. They appreciated this practice and did not believe additional flexibility would be beneficial. Similarly, eligibility workers in one Maryland local office always required verification of physical and mental limitations and felt it removed some of the pressure from eligibility workers' roles. Eligibility workers in Wisconsin also felt that removing the requirement for verification put a lot of responsibility on their shoulders to correctly determine if someone should or should not be excused from work requirements. However, staff also noted that requiring verification increased the burden on applicants and participants.

State agencies reevaluated individuals for exemptions and exceptions during the recertification process, which was like the determination process at application. Most State agencies reevaluated individuals who had received an exemption or exception during the previous reporting period for the general work requirement (94 percent) and ABAWD work requirement (92 percent) at recertification. Similarly, individuals that did not have an exemption or exception during the previous certification period were also reevaluated (98 percent for general work requirements and 96 percent for ABAWD work requirements) during recertification. The process for determining exemptions or exceptions due to physical or mental limitations at recertification did not differ from the process at application among case study States.

Similar physical and mental limitations were considered for exemptions from the general work requirement and exceptions from the ABAWD work requirement. State agencies typically considered the same physical and mental limitations when excusing participants from the general and ABAWD work requirements. The most common included long-term physical disability (98 percent for general work requirement and 96 percent for ABAWD work requirement), long-term physical illness (98 percent for general work requirement and 96 percent for ABAWD work requirement), cognitive or developmental disabilities (98 percent for general and ABAWD work requirement), mental illness (98 percent for general and ABAWD work requirements), short-term physical injury (94 percent for general and ABAWD work requirements), and short-term physical illness (94 percent for general and ABAWD work requirements).

Most State agencies allowed applicants or participants to appeal fitness for work determinations. Over three-quarters of State agencies (78 percent) allowed applicants to appeal an exemption or exception decision for general work requirements and ABAWD work requirements. However, from the case studies it was clear that it was uncommon to appeal decisions related to fitness for work determinations. This was likely because individuals could provide verification if eligibility workers found their situation unclear or questionable. Findings from the case studies also revealed that the process for appealing fitness for work determinations were largely consistent across States.

Trends in Fitness for Work Determinations Among Case Study States

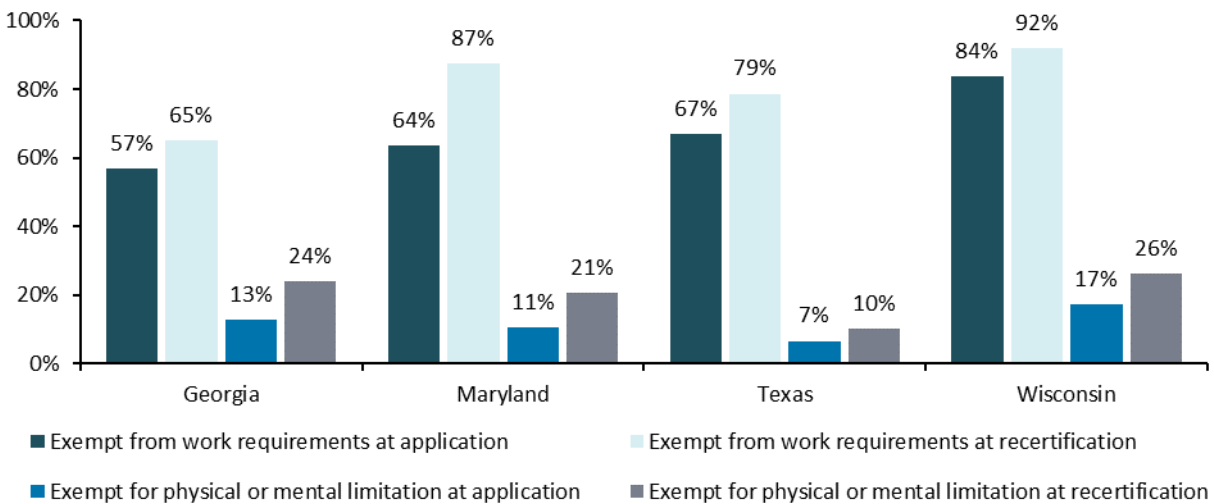
State administrative SNAP data from the four case study States provided insight into the rate at which the four States issued fitness for work determinations and whether any patterns or trends in fitness for work determinations existed within and across the four case study States.

Exemptions due to physical or mental limitations were relatively uncommon. In each case study State, well over half of SNAP applicants ages 16 to 59 were exempt from the general work requirements (figure 7.2). Rates at which individuals were exempt because of physical or mental limitations (including those receiving disability payments) at application ranged across the four States from 7 to 17 percent.³ In three of the case study States, the most common reason for exemption was caring for a dependent child or incapacitated person. In Maryland, common exemption reasons included already working the equivalent to at least 30 hours per week or being already subject to the work requirements in TANF or UI.

Exemption rates at recertification were higher than at initial application. The proportion of participants exempt from the general work requirements was higher at recertification than at application in all case study States, and the proportion exempt because of a physical or mental limitation at recertification was as high as one-quarter. A higher percentage of individuals may have been determined to have physical and mental limitations at recertification than at application for several reasons. For example, some of those who were physically and mentally able to work may have found employment before recertification and left SNAP, resulting in a greater proportion of adults on the caseload at recertification who were unfit for employment. Additionally, disabling conditions may have surfaced as eligibility workers or E&T service providers got to know participants or as participants who did not initially reveal their conditions were unable to meet work requirements and subsequently granted exemptions because of their limitations.

³ Each case study State's data system, except Wisconsin's, allowed eligibility workers to code only one reason for exemption from the general work requirements.

Figure ES.2. Percentage Exempt from General Work Requirements at Application and Recertification, All Individuals Ages 16-59



At application N= 208,155 for Georgia, 372,765 for Maryland, 828,289 for Texas, and 149,636 for Wisconsin; at recertification N =280,083 for Georgia, 126,043 for Maryland, 537,782 for Texas, and 231,796 for Wisconsin

Exceptions from time limits on benefits because of physical or mental limitations are rare. Within three of the four States, the percentage of ABAWDs who were not subject to time limits on benefits because of a physical or mental limitation beyond that which would exempt them from the general work requirement was 2 to 3 percent at both application and recertification. In Maryland, 8 percent were not subject to time limits on benefits for this reason at recertification.

Disability flags that exist in State data systems were not reliable indicators for individuals exempt from work requirements because of physical or mental limitations. Each case study State had a disability flag in its data system that was distinct from work requirement exemption reason codes. In three of the four case study States, a non-trivial percentage of applicants coded as having a disability in this field were subject to the general work requirements (9 percent in Georgia, 28 percent in Maryland, and 12 percent in Wisconsin).⁴ Possibly, SNAP eligibility workers found these applicants’ specific disabilities did not interfere with applicants’ ability to work. Conversely, in each State, a small number (1 to 2 percent) of those not coded as having a disability were determined exempt from the work requirements because of a physical or mental limitation.⁵ Eligibility workers may have mistakenly not coded some of these applicants as having a disability in the separate disability flag.

While patterns in determinations generally did not vary by community characteristics, various individual or household characteristics decreased the likelihood of being determined unfit for work because of a physical or mental limitation. The following types of applicants in each case study State were less likely to be determined unfit for work because of a physical or mental limitation: applicants living with children (compared to those without children in their households); females (compared to males); and relatively younger applicants (compared to those over age 30). Results may have been driven by a relatively higher percentage of those with

⁴ The percentage was lower in Texas (1 percent), where unlike in the other States, the disability flag was synonymous with receipt of SSI; receipt of SSI automatically qualifies someone for an exemption from the general work requirements.

⁵ The percentage was higher in Texas (5 percent), which may reflect the fact that the disability flag was synonymous with receipt of SSI in this State, and physical or mental limitations that don’t qualify someone for SSI may still qualify them for an exemption from work requirements.

children in their household, females, and younger applicants caring for a child under six or an incapacitated person and determined exempt from work requirements for that reason.

Case study States differed in the variability in determinations among entities making the determinations. The Maryland data identified which local offices made the determinations for people in the analysis sample. The Texas and Wisconsin data identified the eligibility worker who made the determinations. The Georgia data did not provide any information on where the determinations were made or who made them. There was not substantial variation in the rate at which offices in Maryland and eligibility workers in Texas determined individuals to be not subject to work requirements due to a physical or mental limitation. In Maryland, three-fourths of local offices determined individuals to be not subject to work requirements due to a physical or mental limitation at about the average rate, with only 3 percent of local offices determining individuals to be physically or mentally unfit at a much higher or lower rate than the average State rate (more than 10 percentage points). Similarly, in Texas most eligibility workers determined individuals to be not subject to work requirements for being physically or mentally unfit (82 percent) at the average State rate, with only 5 percent doing so at a much higher or lower rate. There was more variability in fitness for work determinations in Wisconsin among eligibility workers, with more than one-quarter coding applicants at a much higher or lower rate.

Good Cause Determinations

Based on survey findings, the process for determining policies and procedures about good cause determinations were similar to the process for making exemptions and exceptions. State agencies primarily utilized federal regulations, statute, or guidance. In addition, many of the physical and mental limitations that State agencies would consider for a good cause determination (e.g., short-term physical injury, long-term illness) could also be considered for an exemption or exception, which implies that there were not usually specific physical or mental limitations dedicated specifically to good cause versus exemptions or exceptions. This is not necessarily surprising, since most State agencies also reported that a good cause determination could lead to an exemption from the general work requirement (88 percent) or exception from the ABAWD work requirement (86 percent).

Findings from the case studies revealed some discrepancies between how staff applied good cause determinations policies and when good cause should be used versus exemptions or exceptions. In one case study State, some eligibility workers used the term “good cause” interchangeably with “exemptions and exceptions.” They noted that there was significant overlap between physical and mental limitations that would be eligible for a good cause determination and exemptions or exceptions. In another State, eligibility workers reported the processes for determining exemptions and exceptions and good cause both occurred at initial application or recertification while the policy manual assessed good cause prior to issuing a sanction for non-compliance in work requirements. Staff did specify that they typically used good cause for shorter-term issues and exemptions or exceptions for longer-term limitations.

Involvement of E&T Programs

The involvement of the E&T programs in the fitness for work determination process varied among the case study States. For example, in Maryland, E&T providers usually did not communicate with local SNAP staff to express if they believed someone could qualify for an exemption, exception, or good cause determination. The responsibility was on the participant to communicate this information. Staff in Texas and Wisconsin highlighted the collaborative relationship between E&T

providers and eligibility workers. In Wisconsin, rural E&T staff and eligibility workers shared a physical office; staff reported that the co-location allowed for both E&T staff and eligibility workers to easily reach out to one another and allowed them to build a collaborative relationship.

1. Introduction

The Supplemental Nutrition Assistance Program (SNAP), administered by the U.S. Department of Agriculture’s Food and Nutrition Service (FNS), provides nutrition assistance benefits to eligible households with low incomes in an effort to reduce hunger and improve health and well-being. To remain eligible, households must meet certain work requirements. The Food and Nutrition Act of 2008 requires SNAP participants ages 16 to 59 to meet the general work requirements, which require individuals to register for work or participate in employment and training (E&T) or workfare if assigned by the State agency, take a suitable job if offered, and not voluntarily quit a job or reduce work hours below 30 a week without a good cause. Participants are exempt if they meet one of these conditions:

- Working at least 30 hours per week (or earning wages at least equal to the federal minimum wage multiplied by 30 hours).
- Caring for a child younger than 6 or an incapacitated person.
- Participating regularly in an alcohol or drug treatment program.
- Meeting the work rules for Temporary Assistance for Needy Families (TANF).
- Receiving or have applied for unemployment benefits.
- Studying in school or a training program at least half-time.
- Unable to work due to physical or mental limitations.

In addition, a subset of participants who are not exempt from the general work requirements—adults ages 18 to 54 who are not disabled and live in households without dependents, referred to as able-bodied adults without dependents (ABAWDs)—are subject to a three month time limit in a 36 month period on receipt of SNAP benefits unless they work or participate in a work program or a combination of the two, for 20 hours per week or averaged monthly for at least 80 hours per month.^{6, 7} ABAWDs can meet their requirements by participating in a qualifying E&T program or other meaningful work activity. Participants are excused from the ABAWD work requirement and time limit if they meet one of these conditions:⁸

- Unable to work due to physical or mental limitations
- Pregnant
- Have someone under 18 in your SNAP household
- Exempt from the general work requirement
- A veteran
- Experiencing homelessness
- Age 24 or younger and in foster care on their 18th birthday

⁶ Work can include volunteering and in-kind work. Work programs can include E&T, a program under 1 of the Workforce Innovation and Opportunity Act (WIOA), a program under section 236 of the Trade Act of 1974, or a program of employment and training for veterans operated by the Department of Labor or the Department of Veterans Affairs. Individuals can also participate in a workfare program for the number of hours assigned each month by the State agency. Participants can also combine work and work programs to meet hour requirements.

⁷ As of October 1, 2024, the age of those subject to the ABAWD time limit increased to age 18-54. The age limit for those subject to the ABAWD time limit prior to the June 3, 2023, Fiscal Responsibility Act of 2023 was 18-49

⁸ The Fiscal Responsibility Act of 2023 amended the Food and Nutrition Act of 2008 to excuse individuals experiencing homelessness, veterans, and individuals age 24 or younger and in foster care on their 18th birthday from being subject to the ABAWD work requirement and time limit. Changes made for veterans, individuals experiencing homelessness, and individuals in foster care on their 18th birthday go through Fiscal Year 2030.

Additionally, each State agency has a limited number of discretionary exemptions it can use to exempt participants from the ABAWD time limit in other circumstances, as determined by the State agency. Each discretionary exemption extends eligibility to one ABAWD for one month. FNS calculates and issues discretionary exemptions on an annual basis based on a percentage of the covered individuals in the State.

While FNS provides guidance on who can be excused from the general and ABAWD work requirements, State agencies have discretion in operationalizing the exemptions from the general work requirements and exceptions from the ABAWD work requirements.⁹ This includes how eligibility workers determine whether an applicant or participant is unable to work due to a physical or mental limitation, including the type of verification that's required and questions asked in eligibility interviews.

Statutory language around fitness for work determinations due to mental or physical limitations varies slightly for the general and ABAWD work requirements. For the general work requirements, State agencies must define physical and mental fitness but cannot use a definition, procedure for verification, or verification that is less restrictive than what the State uses for determining a physical or mental limitation under the Temporary Assistance for Needy Families (TANF) program.¹⁰ Similarly, State agencies determine if applicants or participants are physically or mentally unfit for employment for the ABAWD work requirements.¹¹ Federal regulations around ABAWD work requirement and time limits specify that an individual is excused for the following reasons:

- Receiving temporary or permanent disability benefits issued by governmental or private sources.
- Obviously mentally or physically unfit for employment as determined by the State agency.
- If the unfitness is not obvious, provides a statement from a physician, physician's assistant, nurse, nurse practitioner, designated representative of the physician's office, a licensed or certified psychologist, a social worker, or any other medical personnel the State agency determines appropriate, that he or she is physically or mentally unfit for employment.

In addition to exemptions and exceptions from the work requirements, State agencies may determine that participants who are not excused from the general work requirements, known as work registrants or ABAWDs, who do not comply with work requirements may have good cause for noncompliance, also known as good cause determinations. Acceptable reasons for not complying with work requirements include, among others, lack of transportation or childcare, illness, or other circumstances beyond the individual's control.¹² If the State agency determines that a SNAP recipient has good cause for not complying with work requirements, they may re-screen that individual to see if they should be exempt from work requirements.

⁹ The report will use "exceptions" when referring to applicants and participants being excused from ABAWD work requirements and time limits and "exemptions" when referring to applicants and participants being excused from the general work requirement.

¹⁰ 7 CFR Part 273.7(b)(1)

¹¹ 7 CFR Part 273.24(c)(2)

¹² 7 CFR Part 273.7(i)(2); 7 CFR Part 273.24(b)(2)

1.A. Study Objectives

The primary purpose of this study was to better understand how State agencies determine whether individuals are excused from work requirements or have good cause for not meeting work requirements due to physical or mental limitations. Specifically, the study was designed to meet four objectives:

- **Objective 1:** Document the policies and guidelines used for making fitness for work determination by all 53 SNAP State agencies.
- **Objective 2:** Describe the process States use for making fitness for work determinations.
- **Objective 3:** From analysis of administrative data and data on community characteristics from the United States Census Bureau, determine if there are any general patterns and trends in fitness for work and good cause determinations within and across the four (4) case study States.
- **Objective 4:** For each of the four (4) case study States, determine how closely caseworkers follow the State's fitness for work and good cause determination policies and requirements and the challenges they face in applying the policy.

1.B. Methods

To meet the study objectives, the study had three data collection activities: (1) a survey of 53 State SNAP agencies; (2) a document review of 53 State agencies; (3) and four in-depth case studies, including semi-structured interviews and administrative data analysis.

1.B.1 Survey Data Collection and Analysis

The study team fielded the web *Survey of State SNAP Agencies about Exemptions from Work Requirements and Good Cause* to all 53 State SNAP agencies (including the 50 States, District of Columbia, U.S. Virgin Islands, and Guam) from October 2022 to March 2023. The survey consisted of three sections that asked about: (1) the State agency's processes, policies, and procedures to determine whether an applicant was exempt from general and ABAWD work requirements due to physical and mental limitations; (2) the State agency's processes, policies, and procedures to determine whether an applicant had good cause for not meeting general and ABAWD work requirements; and for a subset of States with mandatory E&T programs (3) the State agency's processes, policies, and procedures to determine exemptions from mandatory employment and training (E&T) requirements.¹³ The study team programmed the survey and ensured State agencies only received the questions relevant to them (e.g., voluntary E&T States skipped the mandatory E&T survey section). The study team obtained a response rate for the survey of 94 percent with 48 State agencies fully completing the survey and two State agencies partially completing the survey.

Upon completion of data collection, the study team prepared the survey files for analysis. To develop the final datafiles, the study team imported the survey data into Stata and cleaned the survey data (e.g., renamed and recoded variables). To ensure high quality data, the study team also conducted quality assurance checks, including cross-checking responses with the documents from the document review, following up with State agencies when additional clarification was needed, and updating invalid or incomplete responses. The study team conducted qualitative coding to identify

¹³ States with mandatory E&T programs require individuals to participate in E&T as a condition of eligibility.

themes across the open-ended survey responses. We also produced descriptive statistics from the close-ended responses.

1.B.2 Document Review Data Collection and Analysis

From July to September 2022, the study team conducted a broad scan of publicly available documents for all State agencies. In this process, the study team requested the most recent SNAP E&T State plans from FNS and scanned online resources for publicly available SNAP program and policy manuals, training materials and desk guides for eligibility workers, and notices of consolidated work requirements for participants.

In addition, the survey of State agencies requested documents that the study team did not find during the initial scan. At the conclusion of the survey fielding period, the study team had collected State SNAP Policy Manuals for 48 State agencies, SNAP E&T State plans for 53 State agencies, training materials and/or desk guides for eligibility workers for 24 State agencies, and Notice of Consolidated Work Requirements for 26 State agencies. The study team then reviewed the documents to supplement the survey responses from State agencies and the qualitative data collection in the case study States.

1.B.3 Case Study Data Collection and Analysis

The study team conducted in-depth case studies of four State agencies. The case study data collection began in October 2023 and ended in April 2024. The criteria for State selection included a mix of SNAP program characteristics (e.g., county administered vs. State administered, mandatory vs. voluntary E&T program) and geographic characteristics. The four selected States were Georgia, Maryland, Texas, and Wisconsin. Table 1.1. presents an overview of key State characteristics.

Table 1.1. Overview of Case Study States

Characteristic	Georgia	Maryland	Texas	Wisconsin
FNS Region	Southeast	Mid-Atlantic	Southwest	Midwest
Mandatory vs. Voluntary E&T	Voluntary	Voluntary	Mandatory	Voluntary
County vs. State administered	State	State	State	County

Qualitative data collection and analysis

The study team conducted site visits with study States between October and December 2023; three were virtual site visits, and one included a mix of in person and virtual interviews. Each site visit included a series of in-depth, semi-structured interviews with administrators and staff at State SNAP offices, local SNAP offices, and E&T providers.

The study team used semi-structured interview guides to better understand the State’s policies and procedures around making fitness for work determinations due to physical or mental limitations and good cause determinations. The State SNAP office recommended two local SNAP offices and two E&T providers, one in a rural area and one in an urban area, to better understand variation in policies and procedures across the State.

Two members of the study team conducted each interview: one to lead the interview and one to take notes. Interviewers input information from the notes into an Excel spreadsheet that was aligned with the study objectives and research questions. The Excel spreadsheet helped capture emerging

themes and ensured consistency across study State analysis. In addition, the study team met regularly throughout analysis to discuss emerging themes.

Administrative data collection and analysis

The study team collected case- and individual-level SNAP administrative records from each of the case study States for all active cases within a three-month period (table 1.1). For each case, we obtained data about the application and latest recertification associated with the case’s current or most recent spell on SNAP. We tabulated the data, produced descriptive statistics using Stata, and, to conduct analyses by geographic area, merged the files with data from the Census Bureau’s 2018-2022 American Community Survey 5-Year Estimates. In presenting the findings, we focused on medium to large differences in patterns of determinations. We defined large as more than a 10 percentage-point difference, medium as a 5 to 10 percentage-point difference, and small less than a 5 percentage-point difference. We also focused on the presentation of findings in the body of the report on determinations at applications. We pointed out any notable differences in determination patterns at recertification compared with patterns at application but present all tables on determinations at recertification in Appendix D. We were unable to analyze patterns and trends in good cause determinations because none of the States were able to provide sufficient data on good cause determinations.

Table 1.1. Overview of Administrative Data Collection

State	Month One	Month Two	Month Three
Georgia	November 2022	December 2022	January 2023
Maryland	August 2023	September 2023	October 2023
Texas	August 2023	September 2023	October 2023
Wisconsin	September 2023	October 2023	November 2023

1.C. Study Limitations and Considerations

The study has several limitations that are worth considering.

Limitations with survey questions. The survey was intended for State agency administrators; therefore, the questions focused on State-level policies, procedures, and guidance instead of the implementation of fitness for work policies. The study team chose this approach because the State agency administrators may not be aware of all subtle differences or variation in policies carried out at the local level. Instead, the study team interviewed local administrators, eligibility workers, and E&T providers in the case study States and asked them more questions on local implementation and processes. Another limitation was that most survey questions were closed-ended questions, so State administrators were not always able to provide additional details to explain nuances in their policies.

Timing of data collection. Survey data collection occurred from October 2022 to March 2023, and site visits occurred between October 2023 and April 2024 when States were in the process of returning to regular operations after the COVID-19 pandemic, meaning some pandemic-related waivers and flexibilities were still in place or being phased out. Findings reflect policies and procedures at the time of data collection. It should be noted that responses to the interview questions and administrative data reflect a period of transition. In addition, the Fiscal Responsibility Act of 2023 excused homeless and pregnant individuals from the ABAWD work requirement and time limit. Therefore, homelessness and pregnancy are no longer considered physical or mental

limitations that result in exceptions from the ABAWD work requirements and time limit. Because the survey was fielded prior to the passage of the Act, pregnancy and lack of stable housing were included in survey responses as potential reasons an individual may be considered physically or mentally unfit.

Limited data on good cause. The study team was unable to analyze patterns and trends in good cause determinations because none of the States were able to provide sufficient data on good cause determinations.

Sample size. The case study data collection was limited to four State agencies in which we interviewed a select number of State and local staff and E&T providers. Therefore, the reported staff experiences of these four locations may not be generalizable.

1.D. Organization of Report

The remainder of the report presents study findings. Chapter 2 presents findings from the survey of State agencies, and chapters 3-6 present findings from State-specific case studies based on data from the site visits and administrative data. Each chapter includes findings from the document review. Chapter 7 synthesizes key findings from the survey and four study States.

2 State Survey and Document Review Findings

This study aimed to learn about the approaches of all SNAP State agencies, given they had discretion in operationalizing exemptions, exceptions, and good cause determinations and determining who met the criteria. This chapter includes findings from the survey and document review of State agencies on policies and procedures around exemptions, exceptions, and good cause determinations due to physical or mental limitations. The study team analyzed results from 50 State agencies and highlighted findings of interest for subgroups of interest, including county-administered vs. State-administered States.¹⁴

2.A. State Agencies' Approaches to Determining Fitness for Work

Overall, most State agencies used similar methods for developing, implementing, and communicating policies and procedures.

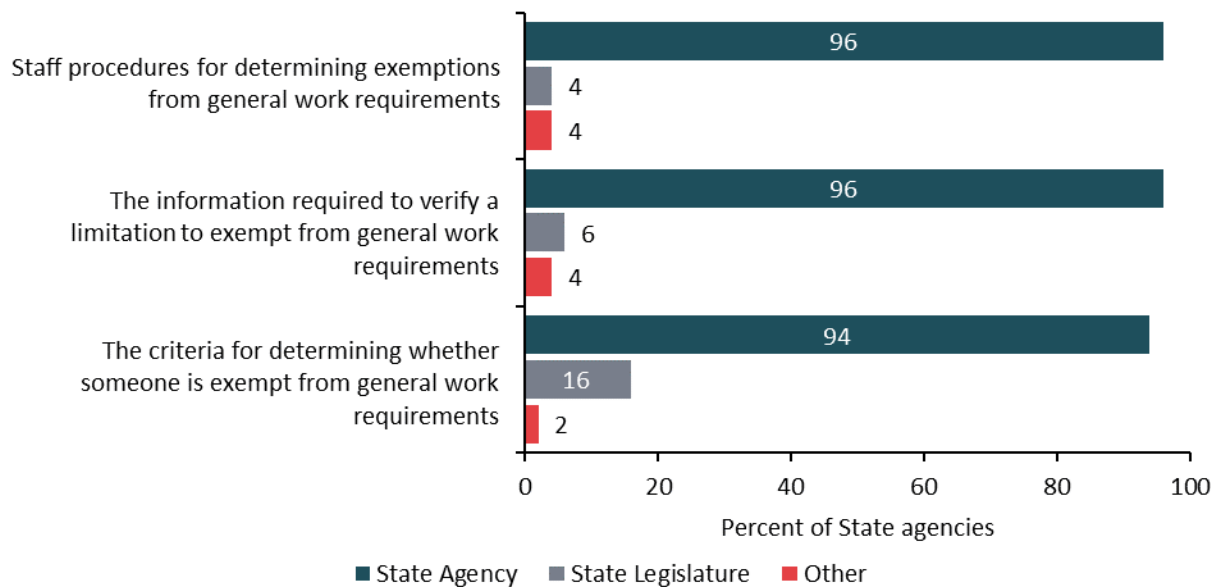
2.A.1 Policies and Procedures

Almost all State agencies reported that the State SNAP agency was responsible for codifying policies about staff procedures for determining whether an applicant and participant met an exemption from the general work requirements (96 percent; figure 2.1), the information required to verify a limitation to exempt a participant from general work requirements (96 percent), and the criteria for determining whether someone was exempt from general work requirements (94 percent). Few State agencies reported the State legislature was responsible for codifying policies.

State agencies who selected “other” were asked to specify ways the State established policies in an open-ended response field. One State agency that selected “other” for verification requirements reported that they allowed counties to request verification of limitation above and beyond the minimum requirements outlined in their State policy. The same State agency, which was county-administered, also reported that while the State agency did recommend staff procedures for determining exemptions from general work requirements, county and tribal human services offices set the procedures which then varied by county and tribe.

¹⁴ Three State agencies did not complete the survey; two State agencies declined to participate, and one State did not respond to the survey.

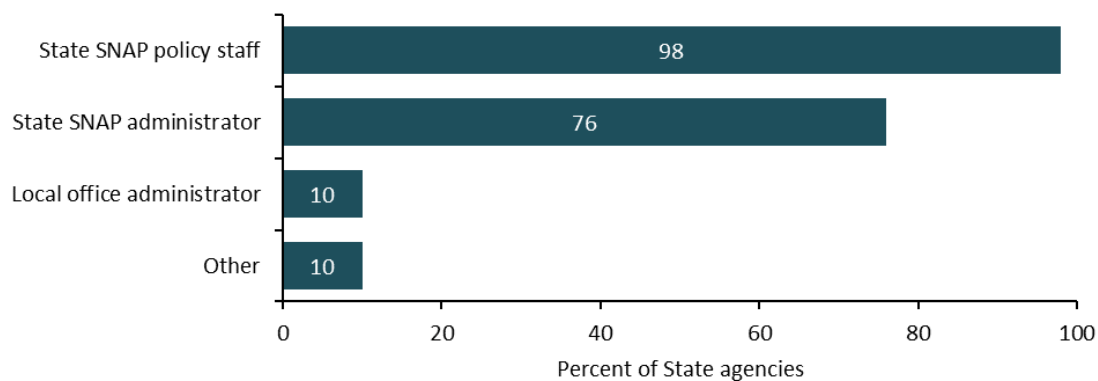
Figure 2.1: State Entity Responsible for Codifying Policies Regarding Exemptions from the General Work Requirement due to a Physical or Mental Limitation



Source: Survey of State SNAP Agencies about Exemptions from Work Requirements and Good Cause
 Note: State agencies could select more than one response. N = 49 State agencies

Almost all State agencies reported that State SNAP policy staff reviewed and updated policies related to exemptions from a work requirement due to a physical or mental limitation (98 percent; figure 2.2).¹⁵ About two-thirds of State agencies reported that State SNAP administrators also reviewed and updated policies (76 percent). The State agencies that reported other State staff reviewed and updated policies related to exemptions and exceptions reported a range of staff, including the Agency’s Office of the General Counsel, State partners, human services department leadership, the Governor’s Policy Office, advocates, and policy workgroups.

Figure 2.2: State Staff Who Review and Update Policies Related to Exemptions from Work Requirements due to a Physical or Mental Limitation

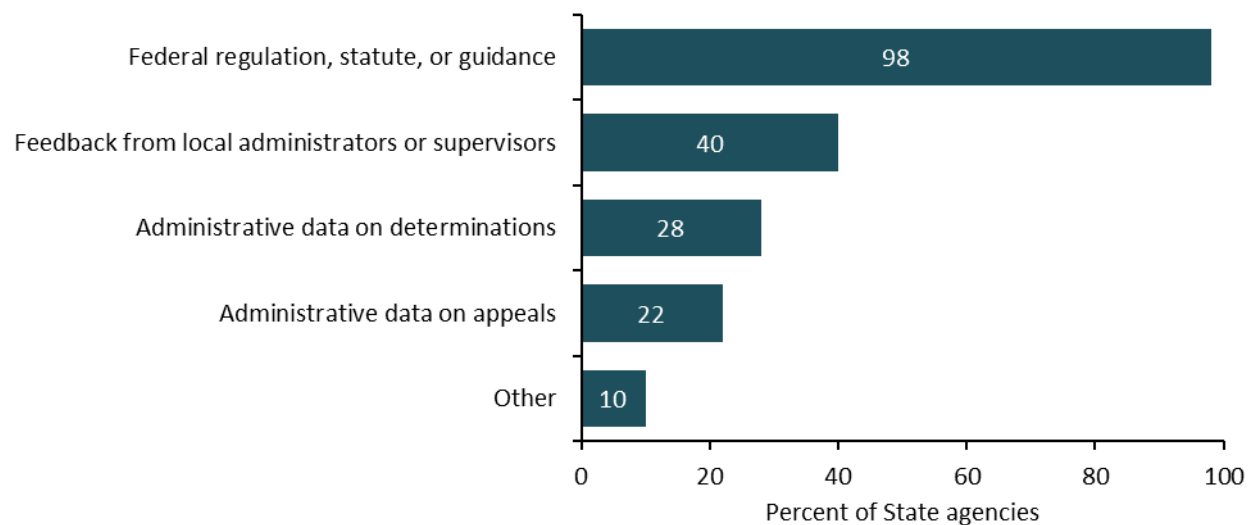


Source: Survey of State SNAP Agencies about Exemptions from Work Requirements and Good Cause
 Note: State agencies could select more than one response. N = 49 State agencies

¹⁵ The survey did not differentiate between the general and ABAWD work requirements. FNS refers to the criteria that excludes certain individuals from the ABAWD work requirement as “exceptions” to align with Section 6(o)(3) of the Food and Nutrition Act of 2008 and program rules at 7 CFR 273.24(c). FNS is continuing to refer to criteria that excluded individuals from the general work requirement and discretionary exemptions as “exemptions”. Updates to terminology were made after the survey was fielded. Therefore, language in the survey used the term “exemptions” when referring to the general work requirements and ABAWD work requirements.

Almost all State agencies consulted federal regulation, statute, or guidance when updating policies regarding exemptions from work requirements due to physical or mental limitations (98 percent; figure 2.3). Less than half of State agencies consulted feedback from local administrators (40 percent), administrative data on determinations (28 percent), or administrative data on appeals (22 percent) when updating these policies. A smaller percentage of State agencies (10 percent) reported consulting other resources when updating policies regarding exemptions and exceptions. These State agencies reported consulting with State working groups, other State program administrators with shared systems, research reports, SNAP E&T State staff, other States’ policies, or feedback from advocates.

Figure 2.3: Information Staff Consult When Updating Policies Regarding Exemptions due to a Physical or Mental Limitation



Source: Survey of State SNAP Agencies about Exemptions from Work Requirements and Good Cause
 Note: State agencies could select more than one response. N = 49 State agencies

Most State agencies reported that they reviewed policies for exemptions from the general work requirements and exceptions from the ABAWD work requirements due to physical or mental limitations only when changes in federal regulation, statute, or guidance occurred (70 percent). Few State agencies reported that they reviewed exemption and exception policies related to physical or mental limitations on a regular schedule, including yearly (six percent), less frequently than every year (six percent), and more frequently than every year (two percent). For State agencies that reported another frequency (14 percent), four States noted that they reviewed policies when they received specific questions or concerns from staff, advocates, or clients regarding physical or mental conditions that were not clearly explained in policy manuals; three State agencies noted they reviewed policies when State regulations changed; and one State agency noted they reviewed policies when the State agency learned about initiatives from other States agencies.

State agencies may consult with FNS to establish or modify their policies and procedures at the State level. Most State agencies reported that they did not receive any technical assistance from FNS regarding their State’s policies on exemptions from the general work requirements or exceptions from the ABAWD work requirements due to physical or mental limitations (86 percent). For the State agencies that did report receiving technical assistance (12 percent), State agencies described receiving technical assistance in the form of discussions regarding screening and referral requirements, review of policy manual and training materials, clarification on the “obviously unfit

for employment” language, and finalizing policies regarding ABAWD exceptions related to “fitness for work.”¹⁶

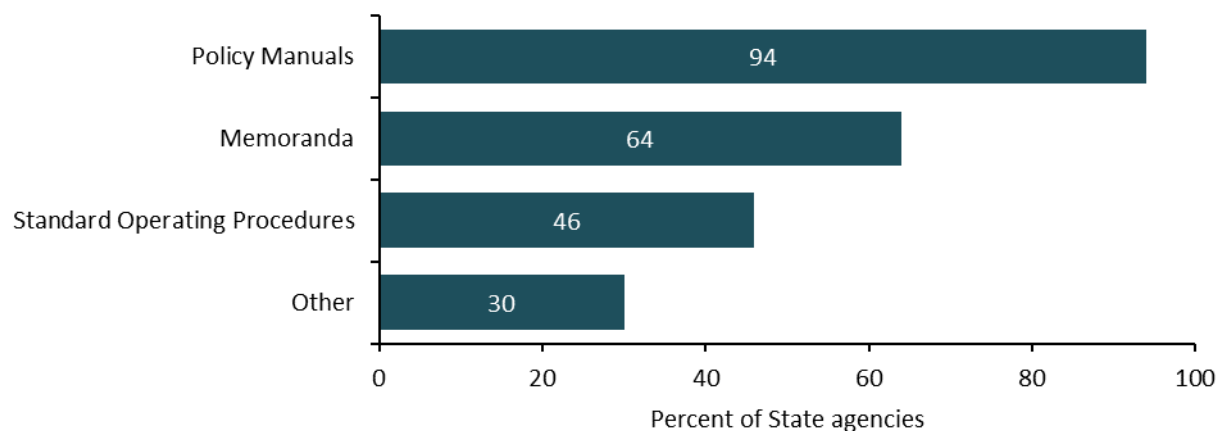
2.A.2 Communicating Policies and Guidelines

In an open-ended response field, the survey asked State agencies to describe the training staff received for determining exemptions from the general work requirement and exceptions from the ABAWD work requirements due to physical or mental limitations. State agencies typically reported offering trainings that provided an overview of work requirements, exemptions, and exceptions including the physical and mental limitations that may have granted exemptions and exceptions. Trainings would have included information on how to screen for, verify, and code physical and mental limitations in their eligibility systems.

State agencies most frequently described offering mandatory trainings for new hires. In addition, some State agencies offered regular trainings (e.g., monthly, semi-annually) and trainings as needed. Many State agencies (30 State agencies) noted that trainings covered both the general and ABAWD work requirements, while a handful of State agencies reported offering separate trainings and specifically noted covering the different exemptions and exceptions and processes for general and ABAWD work requirements.

In addition to the trainings described, State agencies shared the other avenues used to inform staff about how to determine exemptions and exceptions due to physical or mental limitations. Most State agencies informed staff using the policy manuals (94 percent; figure 2.4.) and memorandums (64 percent). Less than half of State agencies (46 percent) used Standard Operating Procedures. State agencies that selected “other” specified that they commonly informed staff through email, meetings, presentations, or desk guides. One State described having a Statewide monthly meeting for their SNAP E&T case managers and SNAP eligibility managers to discuss procedures and share best practices.

Figure 2.4. Methods Used to Inform Staff About How to Determine Exemptions and Exceptions due to a Physical or Mental Limitation



Source: Survey of State SNAP Agencies about Exemptions from Work Requirements and Good Cause
Note: State agencies could select more than one response. N = 49 State agencies

¹⁶ Guidance for screening and referral requirements can be found in 7 CFR 273.7(c)(2). FNS also developed a SNAP Work Rules Screening Checklists and Flow Chart to assist State agencies in screening individuals for both the general work requirements and ABAWD time limit. In addition, FNS issued a policy memo providing additional guidance on E&T screening and referrals in 2022.

2.A.3 Process for Making Fitness for Work Determinations

Staff Involved

Most State agencies reported that eligibility frontline staff were *always* involved in determining exemptions from general work requirements (98 percent; table 2.1) and exceptions from the ABAWD work requirements (96 percent); Eligibility supervisors were less frequently involved. For eligibility supervisors that were *sometimes* involved in determining exemptions from general work requirements, State agencies clarified in an open-ended response field that they might be involved if an eligibility worker was unclear on whether to grant an exemption and asked for guidance, if the supervisor stepped in to process cases due to being short-staffed, or if eligibility supervisors were completing supervisory case reviews or quality assurance reviews.

Less than half of State agencies indicated that quality assurance staff were *always* or *sometimes* involved in determining exemptions from general work requirements and exceptions from the ABAWD work requirements (42 percent). State agencies that selected “other” staff were *always* or *sometimes* involved (6 percent and 14 percent, respectively, for both exemptions from general and ABAWD work requirements) listed SNAP policy staff and office staff.

Table 2.1. Staff Involved in Determining Exemptions and Exceptions, by Work Requirement Type

	General Work Requirements			ABAWD Work Requirements		
	Always	Sometimes	Never	Always	Sometimes	Never
Eligibility Frontline Staff	98%	0%	0%	96%	0%	2%
Eligibility Supervisors	8%	86%	4%	6%	86%	6%
Quality Assurance Staff	4%	38%	50%	4%	38%	52%
Other	6%	14%	8%	6%	14%	10%

Source: Survey of State SNAP Agencies about Exemptions from Work Requirements and Good Cause

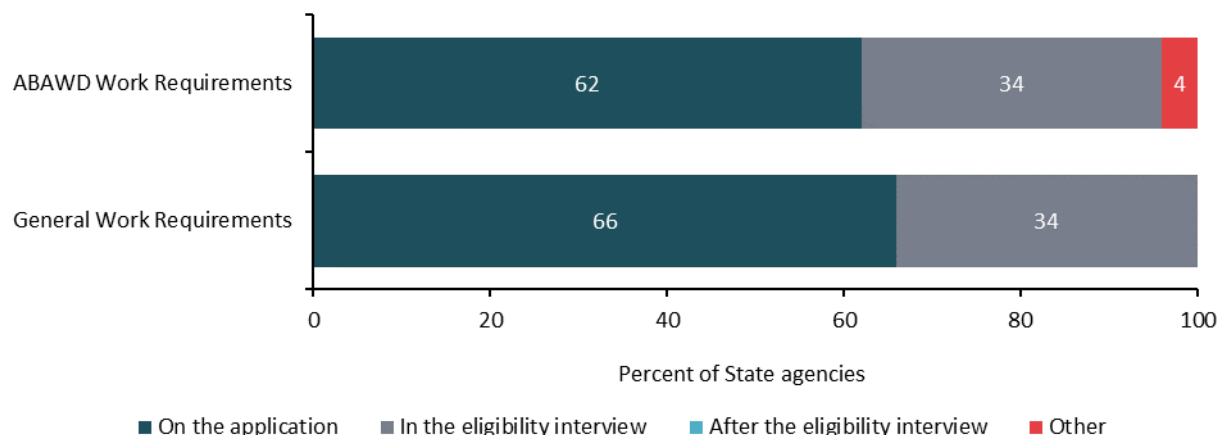
Note: N = 49 State agencies. For general work requirements, six percent of State agencies provided no response for quality assurance staff, and 70 percent of State agencies provided no response for other staff. For ABAWD work requirements, four percent of State agencies provided no response for quality assurance staff, and 68 percent of State agencies provided no response for other staff. Two percent of States did not respond to any part of the question on staff involved in determining exemptions or exceptions from work requirements.

Screening process

State agencies had discretion in operationalizing screening for exemptions from the general and exceptions from the ABAWD work requirements. State agencies also had discretion in determining who met the criteria, including how and when eligibility workers determined whether an applicant was unable to work due to a physical or mental limitation. This section provides an overview of the process State agencies set to screen for mental or physical limitations, including the timing, populations that were screened, mode, and types of physical and mental limitations that were considered.

Timing. The point in the application process when applicants were first asked about mental or physical limitations that may excuse them from work requirements varied. About two-thirds of State agencies (66 percent for general work requirements and 62 percent for ABAWD work requirements; figure 2.5) reported that applicants were first asked about physical or mental limitations that may excuse them from work requirements on the application. About one-third of State agencies (34 percent) reported that applicants were first asked in the eligibility interview.

Figure 2.5. When Applicants are First Asked About Physical or Mental Limitations, by Work Requirement Type



Source: Survey of State SNAP Agencies about Exemptions from Work Requirements and Good Cause
 Note: N = 50 State agencies; No State agency reported that applicants are first asked about physical or mental limitations “after the eligibility interview” for either the general or ABAWD work requirements; State agencies that reported “other” specified that applicants are first asked at the E&T vendor, in a change report, and a combination of the application and interview.

Populations screened. If an applicant notified an eligibility worker that they had a physical or mental limitation in their eligibility interview, most State agencies (82 percent; appendix figure B.1) reported that staff would ask additional questions about the limitation during the interview to determine if the applicant should be eligible for an exemption. Most State agencies also reported that applicants who indicate a physical or mental limitation on the application (76 percent) and applicants who were 18-49 years old and did not have any dependents (72 percent) were screened in the eligibility interviews.

No State agencies reported that State policies allowed for local variation in the populations screened for exemptions from general work requirements. Only two State agencies reported local variation in the populations screened for exceptions from ABAWD work requirements (four percent).

Mode of interviews. Most State agencies (96 percent) shared that they did not require face-to-face interviews as part of the SNAP application process.¹⁷ Of the State agencies that did not require face-to-face interviews, most (80 percent) indicated that the processes for screening individuals for mental or physical limitations were not different for applicants who had face-to-face interviews compared to those that did not. State agencies that reported the process was different indicated in an open-ended response field that verification may not have been required for applicants who had in-person interviews because the eligibility worker could visually verify obvious mental or physical limitations.

Physical or mental limitations considered. Nearly three-quarters of State agencies (72 percent) reported the same physical and mental limitations excused participants from the general and ABAWD work requirements. Nearly all State agencies (over 90 percent; figure 2.6) considered long-term physical disability, long-term and short-term physical illness, cognitive or developmental disabilities, mental illness, and short-term physical injury for exemptions. Some State agencies also considered pregnancy and lack of housing when considering exemptions from the general work requirement (50 percent and 28 percent, respectively). However, lack of housing was more

¹⁷ The fact that most State agencies do not require a face-to-face interview may be affected by the COVID-19 pandemic. At the time the survey was administered, many States were utilizing temporary flexibilities to respond to COVID and were waiving certification and recertification interviews.

frequently considered for exceptions for the ABAWD work requirements (46 percent).^{18,19} A few State agencies clarified in an open-ended response field that while they would not consider pregnancy itself as the basis of an exemption from general work requirements, they would consider a high-risk pregnancy. One State agency reported allowing exemptions from the general work requirements for victims of domestic violence.

In response to COVID-19, the majority of States (84 percent) did not change the physical or mental limitations that could be considered for exemptions. For those that did change the limitations considered, two States clarified that being sick with COVID-19 or suffering from long-term COVID-19 effects were considered for an exemption or deferral for work requirements.

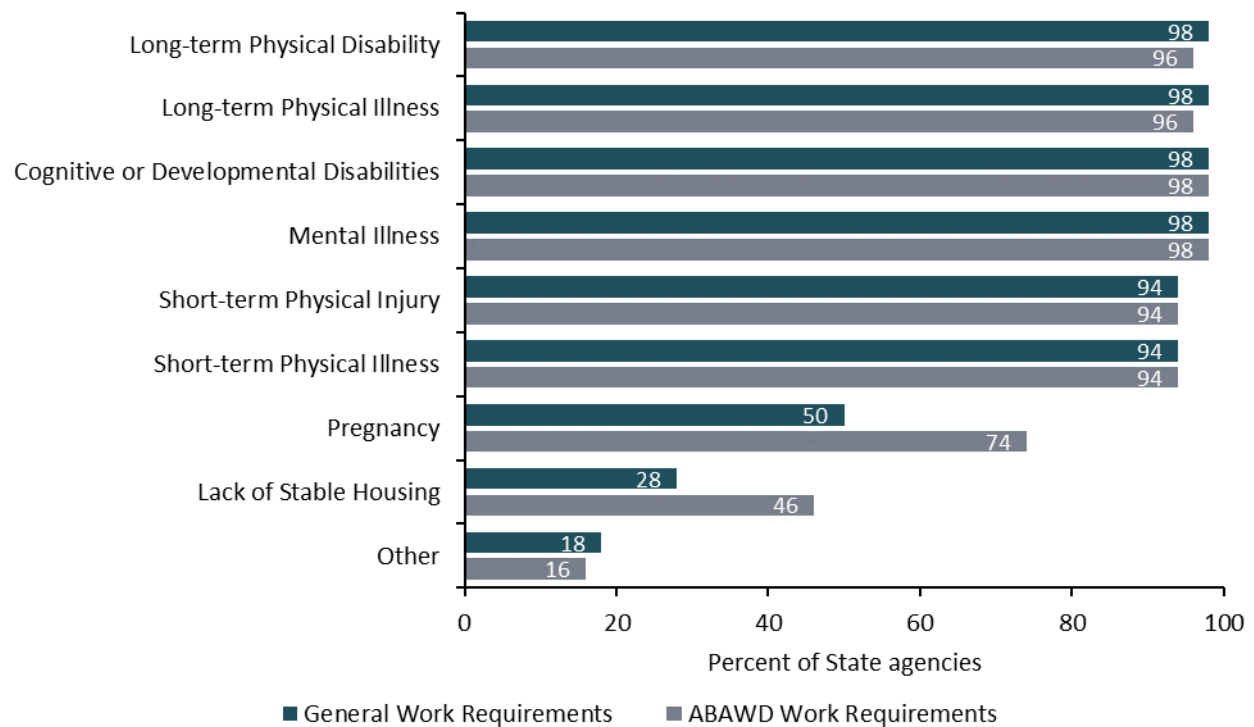
Over half of State agencies (56 percent) allowed staff discretion over the types of physical or mental limitations that could be considered for exemptions from the general work requirements and exceptions from the ABAWD work requirements. State agencies that allowed staff discretion reported in an open-ended response field that staff could use their judgment to grant an exemption or exception for a physical or mental limitation they were able to observe or verify through additional documentation. For example, multiple States' agencies shared that a physical or mental limitation may have been obvious to the eligibility worker when observing the applicant during the eligibility process (e.g., having a walking boot, neck brace, oxygen tank). If the worker's observation was the determining factor to grant an exemption or exception, some State agencies noted that the eligibility worker must have documented the reasons the applicant was not able to work due to the physical or mental limitation observed.

A small number of State agencies (14 percent) reported local variation in the physical or mental limitations that could be considered for an exemption from general work requirements and exception from the ABAWD work requirements and time limit. Local variation was more common among county-administered State agencies. Half of county-administered States reported that their State agencies' policies allowed for local variation in the physical or mental limitations considered for exemptions from general work requirements, and two-fifths (40 percent) reported the policies allowed for exceptions from ABAWD work requirements.

¹⁸ Pregnancy is considered an exception from the ABAWD work requirements and time limits and would not be considered a physical or mental limitation (7 CFR 273.24(c)(6))

¹⁹ The survey was fielded prior to the passage of the Fiscal Responsibility Act of 2023, which excuses homeless individuals from the ABAWD work requirement and time limit.

Figure 2.6. Physical and Mental Limitations Considered by States When Determining Exemptions and Exceptions, by Work Requirement Type

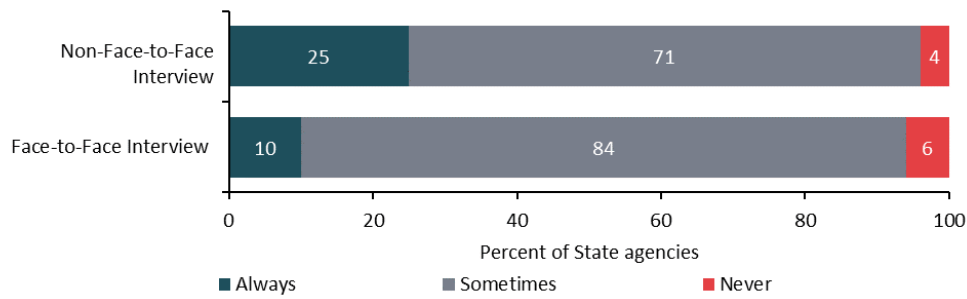


Source: Survey of State SNAP Agencies about Exemptions from Work Requirements and Good Cause
 Note: State agencies could select more than one response. N = 49 State agencies

Verification. Most State agencies reported that they *sometimes* required verification of physical or mental limitations for applicants regardless of interview mode (see figure 2.7). State agencies that reported verification was sometimes required most commonly reported requiring verification if the severity of the limitation or functional limitations of the client’s condition was unclear, regardless of mode (64 percent for face-to-face interviews and 60 percent non-face-to-face interviews; see appendix figure B.2). Roughly one-fourth of State agencies reported that it was up to staff to ask for signed documentation for both face-to-face and non-face-to-face interviews (22 percent and 18 percent).

Among those who always required verification for physical or mental limitations, a larger percent reported doing so to grant exemption or exceptions for applicants who did not complete a face-to-face interview (25 percent) than those who did (10 percent).

Figure 2.7. Frequency with Which Applicants are Required to Provide Verification of Physical or Mental Limitation, by Interview Mode

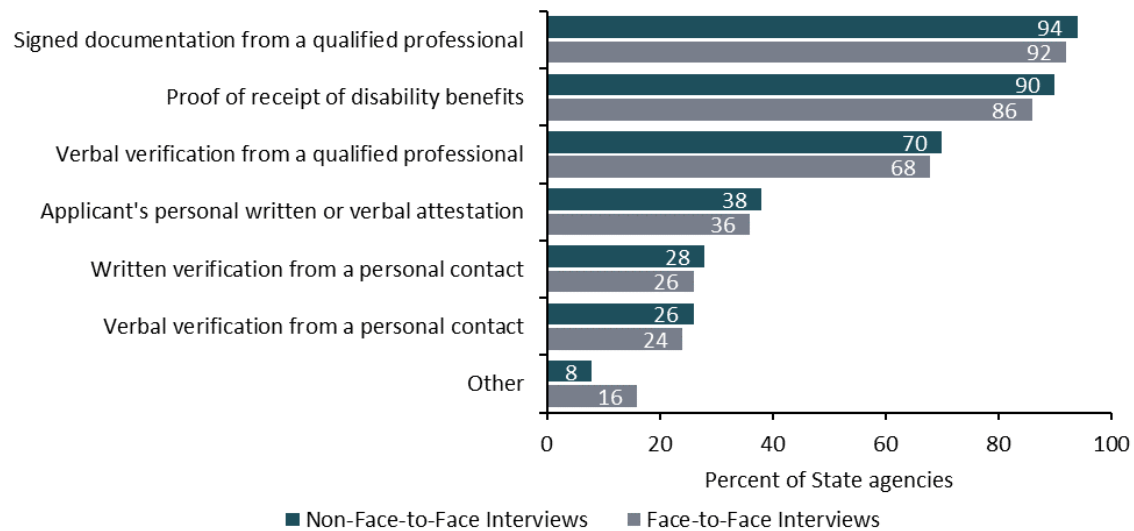


Source: Survey of State SNAP Agencies about Exemptions from Work Requirements and Good Cause
 Note: N = 49 State agencies

State agencies that sometimes or always reported requiring verification accepted similar types of documents to verify a mental or physical limitation regardless of interview type (figure 2.8). Almost all State agencies reported that signed documentation from a qualified professional and proof of receipt of disability benefits could be used to verify a mental or physical limitation for both face-to-face interviews (92 percent and 86 percent) and non-face-to-face interviews (94 percent and 90 percent).²⁰ State agencies that reported accepting other documentation specified accepting verification from a community partner, a verified source, or an acceptance from vocational rehabilitation programs.

Few State agencies allowed for local variation in the information required to verify whether an applicant was excused from general work requirements (six percent) or ABAWD work requirements (10 percent).

Figure 2.8. Documentation Types that are Required to Verify a Mental or Physical Limitation for Work Requirement Exemptions and Exceptions, by Interview Type

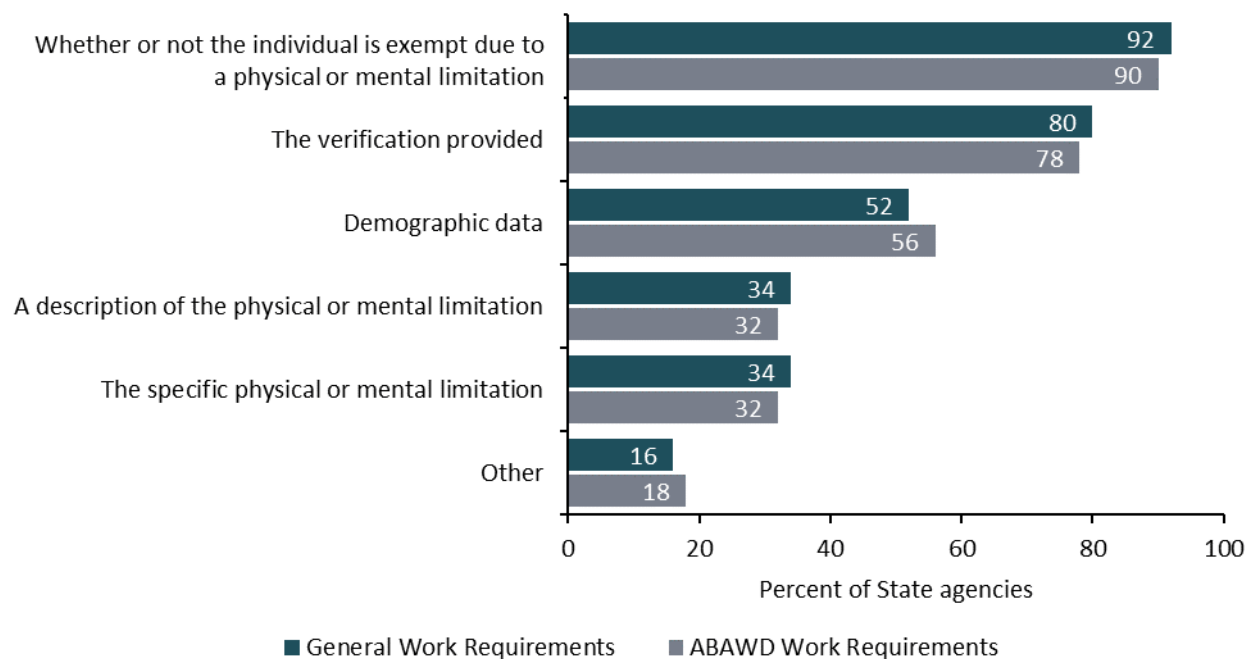


Source: Survey of State SNAP Agencies about Exemptions from Work Requirements and Good Cause
 Note: State agencies could select more than one response. N = 46 State agencies for face-to-face interviews; N = 47 State agencies for non-face-to-face interviews

²⁰ The survey question did not distinguish between if a State was not conducting interviews due to COVID-19 waivers or flexibilities or if they were conducting interviews over the phone. The question only asked if States were currently requiring face-to-face interviews.

Data Requirements. State agencies were asked about the data that staff were required to enter into the State’s eligibility system when determining whether an individual was excused from the general or ABAWD work requirements due to physical or mental limitation. Roughly two-thirds of State agencies did not require staff to enter a description of the physical or mental limitation for either the general or ABAWD work requirements (34 percent and 32 percent). Most State agencies reported requiring staff to enter whether the individual was exempt due to a physical or mental limitation for general (92 percent) and ABAWD (90 percent) work requirements and to enter the verification provided for both types of work requirements (80 percent and 78 percent). State agencies reported entering other types of data, including the timeframe of the exemption or exception and the reason that the exemption or exception was requested.

Figure 2.9. Data Required to Enter into Eligibility and Benefit Determination System for Determining Exemptions and Exceptions, by Work Requirement Type



Source: Survey of State SNAP Agencies about Exemptions from Work Requirements and Good Cause
 Note: State agencies could select more than one response. N = 49 State agencies

2.A.4 Reassessing and Appealing Determinations

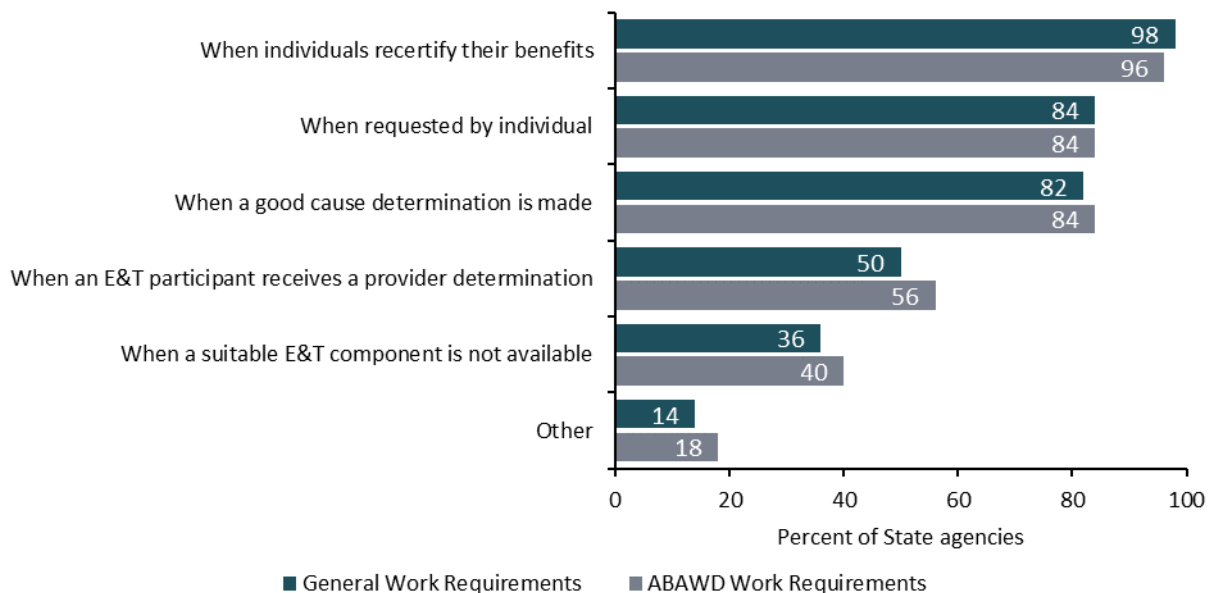
State agencies reported that most initial exemptions or exceptions for individuals who had already been excused from work requirements could be reassessed when individuals recertified their benefits for both general work requirements (94 percent; see appendix figure B.3) and ABAWD work requirements (92 percent). Roughly three-fourth of State agencies reported that an initial determination may have been reassessed for the general and ABAWD work requirements based on information contained in the initial medical assessment (74 percent and 72 percent).

Almost all State agencies reported that initial determination could be reassessed for non-exempt individuals when individuals recertified their benefits for both general work requirements (98 percent; figure 2.10) and ABAWD work requirements (96 percent). Most State agencies reported allowing reassessment at the request of the individual (84 percent for both general and ABAWD work requirements); most State agencies also noted that this reassessment could occur when a good

cause determination was made (82 percent for general work requirements and 84 percent for ABAWD work requirements). State agencies that reported other circumstances reported in an open-ended response field that a reassessment for a non-exempt individual would occur when participants reported a change during the certification period that may affect exemption.

Over three-quarters of State agencies allowed applicants to appeal an exemption or exception decision for general work requirements and ABAWD work requirements (78 percent).

Figure 2.10. Circumstances When a Non-Exempt Individual Can Receive a Reassessment of an Initial Exemption and Exception, by Work Requirement Type



Source: Survey of State SNAP Agencies about Exemptions from Work Requirements and Good Cause
 Note: State agencies could select more than one response. N = 49 State agencies

2.B. State Agencies’ Approaches to Good Cause

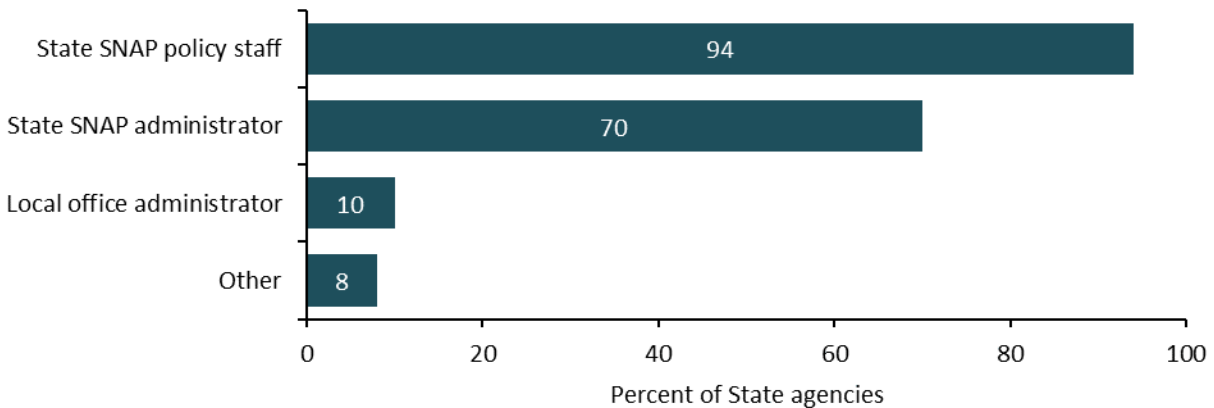
State agencies also had discretion in operationalizing their approach to determining good cause for not meeting the general or ABAWD work requirements due to circumstances beyond an applicant or participant’s control, including illness.²¹

2.B.1 Policies and Procedures for Making Good Cause Determinations

Almost all State agencies reported that State SNAP policy staff reviewed and updated policies for good cause related to a physical or mental limitation (94 percent; figure 2.11). State agencies that noted other staff reviewed and updated policies for good cause related to a physical or mental limitation listed other State entities, such as the State Assembly, State Senate, State General Counsel, and the Governors’ Policy Office.

²¹ The definition of good cause for the general and ABAWD work requirements is similar, but they have separate definitions. Good cause from the general work requirements is defined in 7 CFR 273.7(i); good cause from the ABAWD work requirements is defined in 7 CFR 273.24(b)(2).

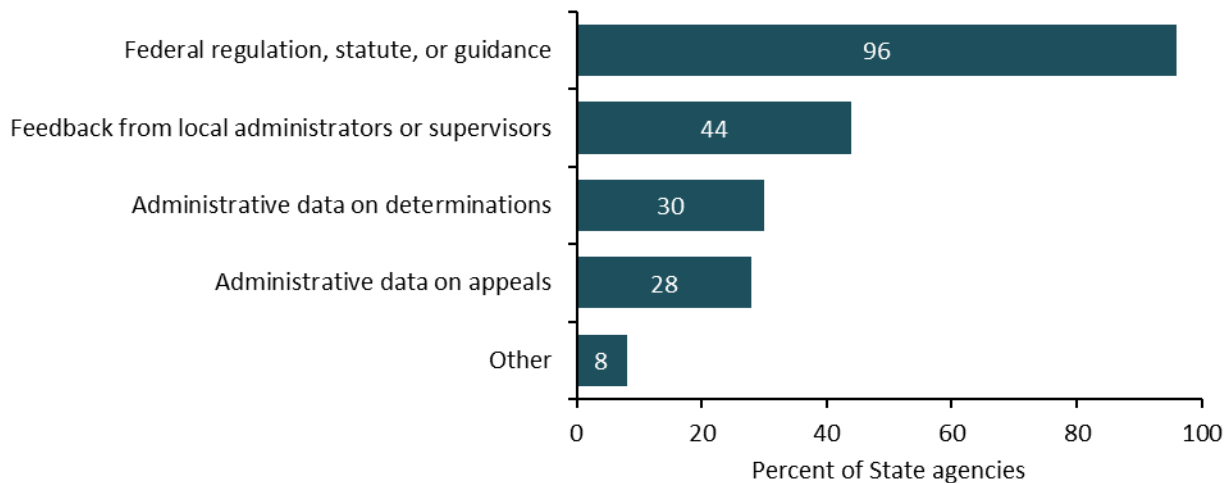
Figure 2.11. State Staff that Review and Update Policies for Good Cause Related to Physical or Mental Limitations



Source: Survey of State SNAP Agencies about Exemptions from Work Requirements and Good Cause
 Note: State agencies could select more than one response. N = 48 State agencies

When updating policies regarding good cause related to a physical or mental limitation, almost all State agencies reported that staff consulted federal regulations, statutes, or guidance (96 percent, figure 2.12). Less than half of State agencies reported that staff consulted feedback from local administrators (44 percent), and one-third of State agencies reported that staff consulted administrative data on determinations (30 percent) and/or administrative data on appeals (28 percent). State agencies that reported staff consulted other resources (eight percent) described the use of feedback from advocates, policies from other State agencies, and research reports when updating policies regarding good cause due to a physical or mental limitation.

Figure 2.12. Information or Resources Staff Consult When Updating Policies Regarding Good Cause Related to Physical or Mental Limitations



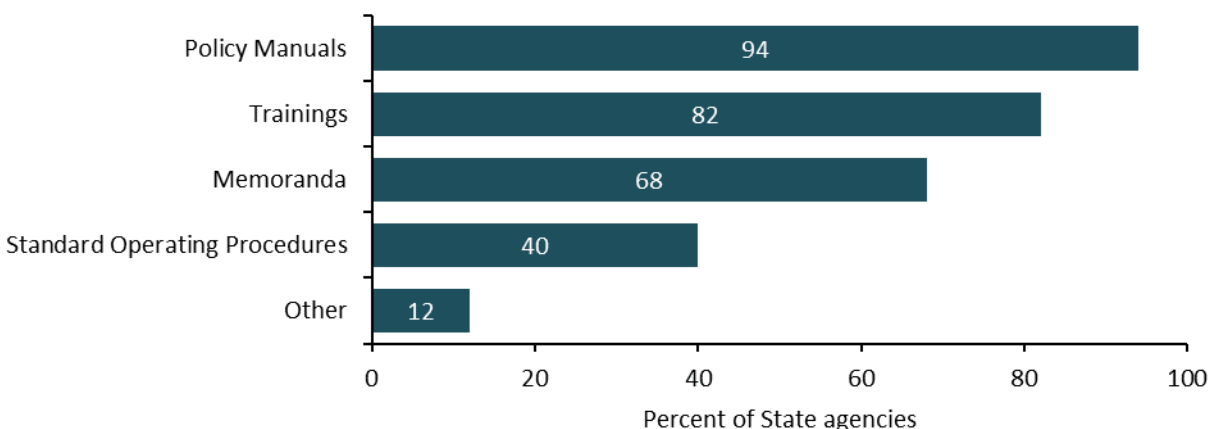
Source: Survey of State SNAP Agencies about Exemptions from Work Requirements and Good Cause
 Note: State agencies could select more than one response. N = 48 State agencies

Less than two-thirds of State agencies noted that they only reviewed policies when changes in federal regulation, statute, or guidance occurred (62 percent). Fewer State agencies indicated that this review process occurred every year (10 percent), less frequently than every year (six percent), and more frequently than every year (four percent). States that selected “other” reported this process

occurred “as needed” when the State received questions or concerns related to physical or mental limitation policy, when the State learned of best practices from other States, and/or when there were policy-relevant issues noted in case-level reviews.

Almost all State agencies used Policy Manuals (94 percent; figure 2.13) and trainings (82 percent) when communicating good cause policies to State staff. Less than half of State agencies (40 percent) used Standard Operating Procedures for communicating good cause policies. State agencies that reported using other methods of communication specified using Desk Guides, Q&A documents, case level reviews, and regular supervisory meetings.

Figure 2.13 Methods of Communicating Policies to State Staff for Good Cause Related to Physical or Mental Limitations



Source: Survey of State SNAP Agencies about Exemptions from Work Requirements and Good Cause
 Note: State agencies could select more than one response. N = 48 State agencies

2.B.2 Process for Making Good Cause Determinations

Staff Involved

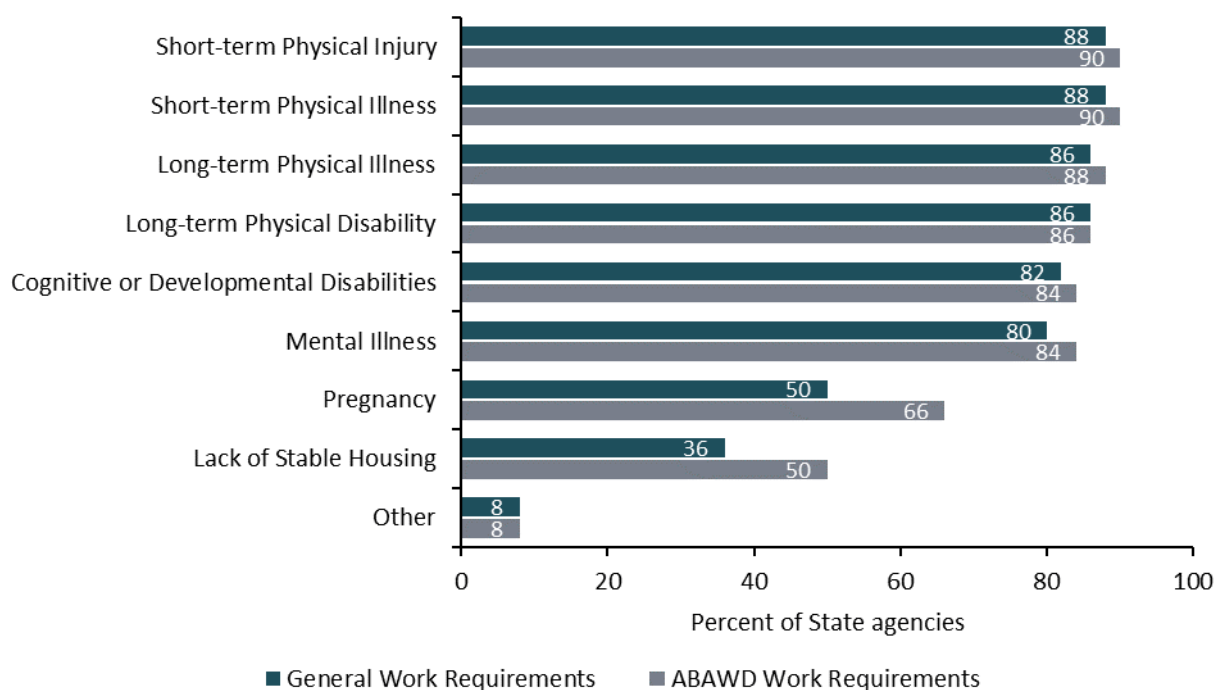
Staff involved in determining good cause were similar to those involved in determining exemptions due to physical or mental limitations. For general work requirements, almost all State agencies indicated that eligibility frontline staff were *always* involved in determining whether good cause determinations result in exemptions (92 percent; see appendix table B.1). However, almost all State agencies indicated that eligibility supervisors were only *sometimes* involved in determining exemptions from good cause determinations (86 percent). About half of all State agencies reported that quality assurance staff were *never* involved in this determination (42 percent). Generally, State agencies reported that the same staff were involved in determining good cause for both general and ABAWD work requirements (94 percent).

For State agencies that reported other staff were involved in this good cause determination to exemption process, seven State agencies noted policy staff are involved, while other State agencies included medical professionals, program specialists, and State office staff.

Screening Process

Physical or mental limitations considered. Most State agencies (69 percent) reported that the physical or mental limitations considered for good cause were the same for ABAWDs and general work registrants. Over three-quarters of State agencies (ranging from 80 to 90 percent; figure 2.14) reported that short-term physical injury, short- and long-term physical illnesses, long-term physical disability, cognitive or developmental disabilities, and mental illness were limitations considered for granting good cause. A higher percentage of State agencies reported that lack of stable housing was a limitation considered for ABAWDs compared to those who reported it as a limitation considered for general work registrants (50 percent for ABAWD work requirements and 36 percent for general work requirements).²² Two State agencies that reported that other physical or mental limitations were considered when determining good cause noted that good cause was not typically granted for physical or mental limitations since they were considered exceptions/exemptions for both ABAWD and general work requirements. Two State agencies noted that circumstances beyond the person’s control due to illness would be considered when determining whether someone had good cause for not meeting either ABAWD or general work requirements.

Figure 2.14. Physical and Mental Limitations Considered by States When Determining Good Cause for Not Meeting Work Requirements, by Work Requirement Type



Source: Survey of State SNAP Agencies about Exemptions from Work Requirements and Good Cause

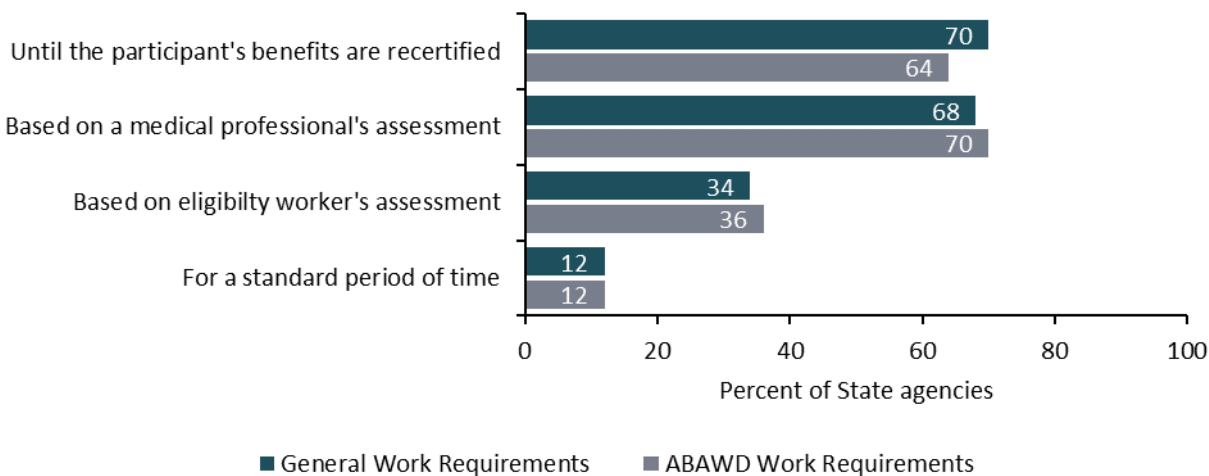
Note: State agencies could select more than one response. N = 48 State agencies; Pregnancy is considered an exception from the ABAWD work requirements and time limit and would not be included as a reason for good cause for not meeting work requirements (7 CFR 273.24(c)(6)).

Length of good cause determination. Most State agencies reported that the length of a good cause determination for not meeting ABAWD requirements was the same as the length of a good cause determination for not meeting general work requirements (90 percent). About two-thirds of State agencies reported that a good cause determination for not meeting general and ABAWD work

²² The survey was fielded prior to the passage of the Fiscal Responsibility Act of 2023, which excuses homeless individuals from the ABAWD work requirements and time limit.

requirements would last until the participant’s benefits were recertified (70 percent and 64 percent; figure 2.15) or would be based on a medical professional’s assessment (68 percent and 70 percent).

Figure 2.15. Length of Good Cause Determination for Not Meeting Work Requirements Based on Physical or Mental Limitation, by Work Requirement Type



Source: Survey of State SNAP Agencies about Exemptions from Work Requirements and Good Cause
 Note: State agencies could select more than one response. N = 47 State agencies

Good cause leading to an exemption or exception. Most State agencies reported that a participant’s good cause determination related to a physical or mental limitation might have resulted in an exemption for general work requirements (88 percent) and an exception from the ABAWD work requirements (86 percent). In an open-ended response field, State agencies were asked to explain under what circumstances a participant’s good cause determination would excuse them from the general and ABAWD work requirements. A little less than half of State agencies noted that a participant with a good cause determination related to a physical or mental limitation could get an exemption from the general work requirements (20 State agencies) and an exception from the ABAWD work requirements (17 State agencies) if they provided external verification of their limitation.

In addition, State agencies reported that a good cause determination could lead to an exemption (15 State agencies) or exception (9 State agencies) when the mental or physical limitation impacted a participant’s ability to find gainful employment. State agencies also noted that the severity of the limitation and the length of the limitation for participants with good cause determinations could lead to exemptions from ABAWD and general work requirements.

2.C. State Agencies’ Approaches to Mandatory E&T Programs

State agencies had flexibility in designing and implementing their E&T program, including whether participation was voluntary or mandatory. States with mandatory E&T programs required all or certain work registrants to participate in E&T as a condition of eligibility and may have had a separate set of exemptions. This section describes the policies and procedures for the eight States with mandatory E&T programs.²³

²³ At the time of data collection, eight States operated a mandatory E&T program. However, only six State agencies completed this section of the survey.

2.C.1 Communicating Policies and Guidelines for Mandatory E&T

State agencies communicated their policies to State and local staff on providing exemptions from mandatory E&T and good cause for mandatory E&T participants through various mediums. Most commonly, the State agencies communicated these policies through the policy manuals and trainings.

2.C.2 Process for Screening for Mandatory E&T

Staff Involved

State agencies shared which staff are involved in determining whether a lack of an appropriate E&T component, due to a participant's physical or mental limitation, granted an exemption from general and exception from the ABAWD work requirements. All six State agencies who responded to the Mandatory E&T section of the survey noted that eligibility frontline staff were *always* involved. Similarly, all six State agencies described that eligibility supervisors were *sometimes* involved. Quality assurance staff were generally less involved; State agencies reported they were *sometimes* or *never* involved. Similarly, only two State agencies had other staff that were *always* or *sometimes* involved. The other staff involved included workforce commission staff and State SNAP office staff.

Screening Process

Population. Five of the six State agencies responded that a subset of participants (as opposed to all general work registrants or all ABAWDs) were required to participate in SNAP E&T. Two of these State agencies specified certain counties that were required to participate in SNAP E&T.

Physical or mental limitations considered. State agencies were asked about the physical or mental limitations that were considered for exemptions or exceptions from their mandatory E&T program. Four State agencies reported mental illness, cognitive or developmental disabilities, long-term and short-term physical illness, long-term physical disability, short-term physical injury, and pregnancy as exemptions if required to participate in Mandatory E&T programs. Three State agencies reported that other physical or mental limitations provided exemptions from Mandatory E&T programs, including chronic homelessness due to physical or mental limitation.

Verification. Most State agencies reported accepting proof of receipt of disability benefits and signed documentation from a qualified professional (five State agencies) to verify a physical or mental limitation. Half accepted verbal verification from a qualified professional or an applicant's personal written or verbal attestation.

2.D. Key Takeaways

This section summarizes the key themes from the survey and document review findings.

Policies on exemptions or exceptions from work requirements due to physical or mental limitations were State directed but federally informed. State SNAP agencies were primarily responsible for codifying and updating policies and procedures on granting exemptions or exceptions from work requirements due to a physical or mental limitation. State SNAP agencies relied on federal regulation, statute, or guidance when updating their policies and procedures, and they reviewed policies for exemptions or exceptions from work requirements only when changes in

federal regulations, statute, or guidance occurred. State SNAP agencies communicated their policies to staff through trainings and policy manuals.

Most applicants and participants were screened at application or interview. Most State agencies first asked about mental or physical limitations on the application or in the eligibility interview. Applicants who notified an eligibility worker in the interview that they had a physical or mental limitation, indicated on the application that they had a physical or mental limitation, or who were 18-49 years old and without any dependents were asked additional questions about the limitation during the interview to screen for an exception.

State agencies used a consistent screening process regardless of interview mode. Most State agencies did not require face-to-face interviews as part of the SNAP application process and indicated that the processes for screening individuals for mental or physical limitations were not different for applicants who had face-to-face interviews compared to those who did not. State agencies that had a different screening process based on interview requirements indicated that verification may not have been required for applicants who had face-to-face interviews. In those cases, eligibility workers may have been able to visually verify an obvious mental or physical disability.

Common physical and mental limitations were considered. State agencies typically considered the same physical and mental limitations when excusing participants from the general and ABAWD work requirements. The most common included long-term physical disability, long-term physical illness, cognitive or developmental disabilities, mental illness, short-term physical injury, and short-term physical illness.

State agencies had uniform policies and guidelines. Overall, policies and guidelines were intended to be applied uniformly throughout the States. Few State agencies noted any local variation in their screening policies, such as the limitations considered and information required to verify an exemption or exception. However, over half of State agencies reported allowing staff discretion over the types of physical or mental limitations that eligibility workers could consider for exemptions or exceptions from work requirements, particularly for limitations that were obvious by visual observation.

Good cause processes were similar. State agencies had similar processes for updating policies and procedures, communicating policies and guidelines, and screening for good cause due to a physical or mental limitation as described for granting exemptions and exceptions from work requirements. State SNAP agencies were responsible for updating policies and use federal regulations, statutes, or guidance to inform changes. State agencies typically used policy manuals and trainings to communicate good cause policies to staff, and most of the same physical or mental limitations considered for exemptions and exceptions were considered when determining good cause.

3 Georgia Case Study

Georgia’s SNAP program was administered by the Office of Family Independence (OFI), located within the Georgia Department of Human Services (DHS), Division of Family and Children Services (DFCS). DFCS had a local office in each of Georgia’s 159 counties (with multiple offices in Fulton County); eligibility workers worked on cases within or outside of the geographic service area in which they work. Policies and procedures around fitness for work and good cause determinations were applied uniformly throughout the State, with eligibility workers often having discretion on who would be granted an exemption or exception. While eligibility workers considered all information entered into the application, they primarily relied on the eligibility interview to determine if someone would qualify for an exemption or exception or if they required additional verification. This produced some variation in eligibility worker’s decisions to grant exemptions and exceptions, as workers may not have all been asking the same interview probes.

This chapter provides an overview of Georgia’s policies and processes surrounding fitness for work determinations and good cause determinations at the time of the site visit in October 2023, and trends in fitness for work determinations based on administrative data analysis in Georgia of all individuals ages 16-59 in all households that received a SNAP benefit in any month between November 2022 and January 2023.

3.A. Fitness for Work Determinations

Georgia considered federal statutes and regulations, as well as FNS guidance provided from reviews of program operations and processes, when setting policy. The State updates its policy manual periodically as federal regulations change, with the most recent changes implemented in November 2023 in response to the Fiscal Responsibility Act. A State-level policy unit was responsible for ensuring that the State’s SNAP policy manual was up to date with the most recent federal regulations.

3.A.1 Defining Fitness for Work Determination

Georgia’s policy manual provided more details about fitness for work exemptions for the general work requirements than about fitness for work exceptions for ABAWD work requirements. For the general work requirement, the policy manual stated that unfitness for work may be “a temporary incapacity or permanent disability and may involve illness, injury, or incapacitation.” The manual gave examples of temporary conditions (“the observation of a cast on a broken leg or information, provided by the client, of a scheduled surgery or recuperation from surgery”), but not permanent conditions. The manual did not elaborate on what is meant by being “physically or mentally unfit for employment” for ABAWDs. The policy manual also stated that pregnant women who were high risk as determined by a medical provider were considered unfit for employment and exempt from the general work requirements; by federal regulation, any pregnancy excepts an individual from the ABAWD time limits. Table 3.1 provides an overview of the exemptions for the general work requirement and exceptions for the ABAWD work requirements related to being physically or mentally unfit.

Table 3.1: Georgia Exemption and Exception Criteria for Fitness for Work

Criteria	Exemption from General Work Requirements	Exception from ABAWD Work Requirements
Receipt of or certification for a temporary or permanent disability benefit (such as Supplemental Security Income; Retirement, Survivors, and Disability Insurance; Veteran’s Benefits; Railroad Retirement; Worker’s Compensation)	◆	◆
Temporary incapacity or permanent disability condition that may involve illness, injury, or incapacitation.	◆	
Have an obvious disability	◆	
Provides verification (letter from a physician or certified mental health provider)	◆	
Pregnancy	High-risk	Any ^a
Homelessness	Chronic	Any ^b

Source: Georgia Division of Family and Children Services Food Stamp (SNAP) policy manual

^a All pregnancy is considered an exception from the ABAWD work requirements and would not be considered a physical or mental limitation.

^b Homelessness is considered an exception from the ABAWD work requirements and would not be considered a physical or mental limitation.

The policy manual distinguished homelessness from chronic homelessness.²⁴ Individuals experiencing the former were not automatically exempt from the general work requirement, but individuals experiencing the latter were. For individuals who were homeless but not chronically so, eligibility workers must have made every attempt to verify unfitness for work using acceptable means, such as documentation from a medical professional or social worker, to grant an exemption from the general work requirements.

3.A.2 Communicating Policies and Guidance for Making Fitness for Work Determinations

The State developed written guidelines on work requirements and exemptions and exceptions, which it communicated to its staff through various methods. This included memorandums to staff and leadership, monthly meetings with supervisors and senior staff, and weekly emails from the deputy commissioner to all staff on updates within OFI. When there were policy changes, the SNAP policy team would communicate with the OFI education and training team to ensure that training materials were updated appropriately.

In addition, OFI staff met with E&T service providers monthly and convened workshops once or twice a year to talk about the referral process, the service landscape, and any changes to eligibility requirements or related rules.

Trainings

OFI did not provide regular training that focused specifically on exemptions or exceptions related to physical or mental limitations. Eligibility workers completed State training during the new hire onboarding process and at least one or two times annually thereafter. OFI shared information on work requirements, exemptions, and exceptions during these trainings. The State may have also

²⁴ The Georgia SNAP policy manual describes the following conditions that may characterize someone who is chronically homeless: sleeping under a bridge, sidewalk, parks, benches, or the street; have an employment history that is inconsistent, sporadic or shows little to no employment; have an employment history that is not consistent with self-sufficiency such as wages that cannot support independent living; and may struggle with drug and/or alcohol abuse; may struggle with undiagnosed mental or physical health issues.

provided more frequent training as was needed. For example, at the end of the COVID-19 public health emergency and reinstatement of the ABAWD time limit in July 2023, OFI retrained staff on the work requirements and associated exceptions. In addition, local offices could request supplemental training if they thought their staff needed additional support. Staff participated in training via an online portal that could be accessed at any time.

3.A.3 Process for Making Fitness for Work Determinations

Policies and procedures around fitness for work determinations were applied uniformly across the State. However, eligibility workers had discretion to determine if any individual should have been excused from work requirements. Staff also noted that the process for determining exemptions from the general work requirements and exceptions for the ABAWD work requirements were the same.²⁵

Making determinations at initial application

Application. Applicants could submit an application online, via paper (by dropping off at a local office, mailing, or faxing), or over the phone by calling a statewide call center. The SNAP application did not directly ask applicants about their fitness for work; but certain information on the application might indicate the presence of a physical or mental limitation. For example, applicants reported sources of income which could include disability-related benefits and employment; medical expenses for anyone who was at least 60 years of age or disabled; and whether the applicant paid for care of a dependent child or disabled adult household member.

Interview. All applicants must have completed an eligibility interview after submitting an application. Prior to the COVID-19 pandemic, applicants participated in interviews either in person or by phone.²⁶ During the pandemic, however, eligibility workers transitioned to remote work and conducted all interviews by phone. Staff continued to work primarily remotely and now completed almost all interviews over the phone.

Eligibility workers determined fitness for work during the eligibility interview, regardless of what applicants reported on the SNAP application form. Eligibility workers did not directly ask applicants during the interview if they had physical or mental limitations that would make them unfit for employment. Rather, eligibility workers probed about any work history, medical expenses for people with disabilities, and receipt of other government benefits reported on the application. Eligibility workers might have also asked about an individual's housing situation and other benefits that would have revealed a physical or mental limitation.

Staff indicated there were guidelines that they followed for how to conduct eligibility interviews, but these guidelines did not provide much detail on exemptions or exceptions. One eligibility worker mentioned that staff often made their own "cheat sheets" with questions to ask to help them make exemption or exception determinations.

Verification. Eligibility workers must automatically grant an exemption or exception to those receiving disability benefits but needed to confirm receipt through proof provided by the recipient or by accessing verification from other State data systems. In the rare instances when eligibility workers conducted interviews in person, workers might have observed potential physical or mental

²⁵ In July 2023, the ABAWD time limits were reinstated after the full suspension that Georgia had imposed under the Families First Coronavirus Response Act (FFCRA) expired. At the time of our interview in October 2023, ABAWDs that had not met work requirements since July 1, 2023 were just beginning to be subject to the time limit on benefits.

²⁶ The eligibility interview requirement at initial application and recertification that were waived during the pandemic were reinstated on October 1, 2023.

limitations among those not receiving disability benefits that would have qualified them for an exemption or exception without verification. Workers who made determinations without verification documented their observations in the case record, describing in detail how the limitation may impact the individual's ability to meet work requirements. If an individual claimed they were unable to work because of a physical or mental limitation that was not obvious to the eligibility worker, the worker would obtain a statement or other verification from a medical source or certified mental health provider before making a determination.

Determination. Except for those receiving disability benefits, eligibility workers used their judgment to determine if a physical or mental limitation made an applicant or participant eligible for an exemption from the general work requirements or exception from the ABAWD work requirements. One eligibility worker said that the decision to grant an exemption from the general work requirements, especially in the case of homeless applicants seeming to have mental limitations, was sometimes based off a “gut feeling.” They also recognized that in these cases, homeless participants may have faced barriers to providing verification. Exemption and exception determinations did not require supervisory approval.

"Honestly, I think the majority of the people I mark as unfit, they wouldn't even know how to get that documentation. They don't have a place to sleep, let alone a computer to get the appropriate documentation."

-Eligibility worker

OPI's eligibility and determination system, Gateway, did not automatically flag individuals who should have received an exemption or exception based on information from the application form or obtained during the eligibility interview. Eligibility workers must have hard-entered data in Gateway indicating whether they granted an exemption or exception from work requirements. For those with physical or mental limitations, eligibility workers selected options labeled “receiving disability benefits” or “unfit for employment” on a dropdown field, for the latter, and recorded in the case notes a more detailed explanation of an individual's condition or the worker's observations. Eligibility workers also selected “unfit for employment” for those who were chronically homeless. An additional exemption reason workers may have selected for the general work requirement related to fitness for work include “pregnancy – high risk.”

Making determinations at recertification

The process for determining fitness for work at recertification was like the process at initial application. Most participants had a six-month certification period, while ABAWDs had a four-month certification period. For participants who had an exemption or exception, eligibility workers asked questions during the eligibility interview about their circumstances to determine if the exemption or exception was still applicable; eligibility workers may have required updated verification, such as a doctor's note, if the disability was not obvious. If the individual was no longer eligible for an exemption or exception, either because their circumstances changed or because they were unable to provide requested verification, the individual was responsible for meeting work requirements. Eligibility workers asked individuals without exemptions or exceptions similar questions during the recertification interview as in the initial eligibility interview. For individuals whose employment status had changed and were no longer working, questions may have focused on reasons for the change in employment status to reveal a potential limitation.

Making determinations at other times

OFI administered Georgia's voluntary SNAP E&T Program, called the SNAP Works Program (SNAP Works). OFI employed SNAP Works employment specialists who were responsible for monitoring the participation of those meeting their work requirement through enrollment in SNAP Works. Georgia contracted SNAP Works providers throughout the State to engage participants in case management, education, training, work readiness, and job search services. SNAP Works employment specialists or service providers might have found that a SNAP participant referred to or enrolled in the program was unfit for work due to a physical or mental limitation. Provider staff might have discovered a potential limitation during the initial participant intake process or while observing participants carrying out E&T program activities. However, employment specialists reported this rarely occurred. Providers explained that most limitations were identified prior to referral to their program and that it was rare that they come across people who were not able to participate in their program because of physical or mental limitations.

SNAP Works employment specialists and providers could not change the exemption or exception determination; determining eligibility for an exemption from general work requirements or exception from ABAWD work requirements laid solely with the SNAP eligibility worker. SNAP Works employment specialists who identified a potential limitation would document it in the Gateway case notes and notify the most recent eligibility worker who worked on the case. They may have also advised the participant to contact an eligibility worker. It then became the responsibility of the eligibility worker to review the information provided and determine if the individual would be eligible for an exemption or exception or if additional verification was required. SNAP Works providers who noticed a potential limitation would document this in CaseWorthy, a separate data system that employment specialists used to enroll participants in SNAP Works and to communicate with SNAP Works providers. The system automatically notified the SNAP Works employment specialist of the updated record, and the employment specialist then followed the procedure noted above.

Participants could also request a change in exemption or exception status between initial application and recertification if there was a change in their circumstances. If a participant called eligibility workers to report a new limitation, eligibility workers would request documentation if the limitation was not obvious, as they would during application or recertification. If the participant did not directly report a new limitation, eligibility workers might probe depending on the nature of the change reported. For example, if income had decreased substantially, an eligibility worker may have probed the participant on why to determine if there may have been a physical or mental limitation that impacted their work situation.

3.A.4 Appealing Fitness for Work Determinations

SNAP participants had the option to appeal a determination related to fitness for work. To request a fair hearing, the individual must have explained why they disagreed with the decision made about their fitness for work. Applicants or participants submitted requests for fair hearings directly to a fair hearings team, who made a decision on the appeal within three days.

3.B. Trends in Fitness for Work Determinations

This section presents findings from the administrative data analysis in Georgia, which included all individuals ages 16-59 in all households that received a SNAP benefit in any month between November 2022 and January 2023.²⁷ Application data was for individuals in households who had not been on SNAP long enough as of January 2023 to have gone through a first recertification for their current spell of participation; data reflected the application for the household's current spell on SNAP. Recertification data were for individuals in households who had been on SNAP long enough as of January 2023 to have gone through at least one recertification; data reflected the household's most recent recertification.

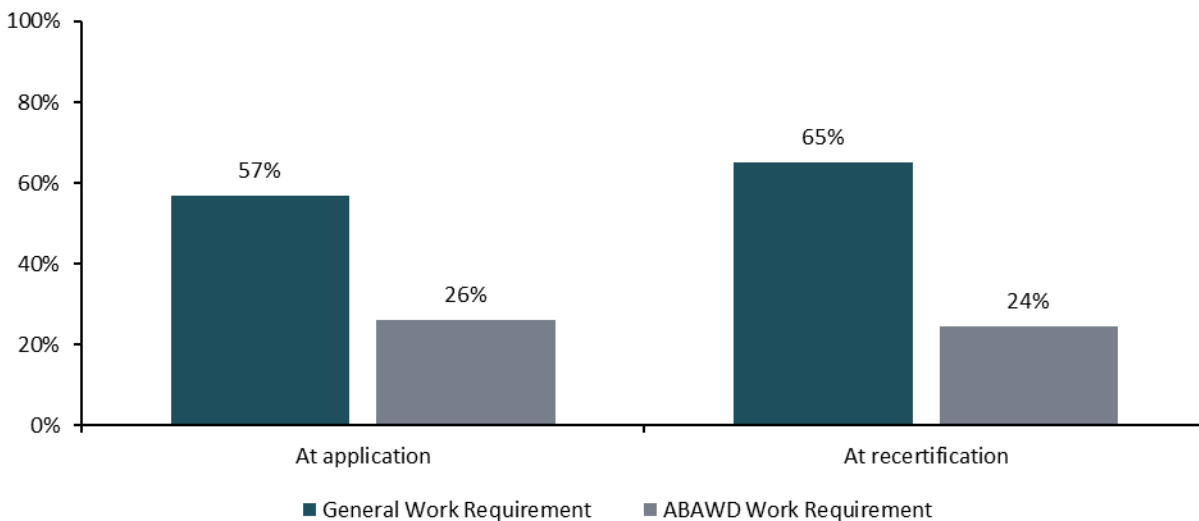
Georgia's eligibility and benefit determination system allowed eligibility workers to code only one reason an individual would be determined not subject to work requirements. For instance, if an individual was caring for a child under age 6 and had a physical or mental limitation, only one of those reasons would be coded in the data system. Respondents to the site visit interviews did not provide information on how they prioritized which reasons to code in the data nor did documents shed light on this question. Thus, the percentage of individuals determined not subject to work requirements because of a physical or mental limitation presented in this section might have been lower than the actual percentage of individuals with physical or mental limitations. Additionally, Georgia's eligibility and benefit determination system did not include separate fields for exemptions from general work requirements and exceptions from ABAWD time limits. All determination reasons for individuals who met the definition of an ABAWD could be considered exceptions from the ABAWD time limit.

3.B.1 Determinations at Application and Recertification

Just over half (57 percent) of all individuals ages 16-59 were determined not subject to work requirements at application (see figure 3.1). The proportion increased to almost two-thirds (65 percent) at recertification. About 29 percent of all applicants ages 16-59 (59,729 of 208,155) and 14 percent of participants with a recertification (40,164 of 280,080) met the definition of an ABAWD by virtue of their age, disability status, and presence of children in the household (appendix tables D.1a and D.1b). About one-quarter of ABAWDs were not subject to the time limits at application and at recertification (26 and 24 percent, respectively).

²⁷ Georgia's system contains a field for the identification number of the eligibility worker taking action on a case, but each time a worker takes action on a case, the field is overwritten. Thus, it was not possible to conduct analyses of determinations at application and recertification by eligibility worker.

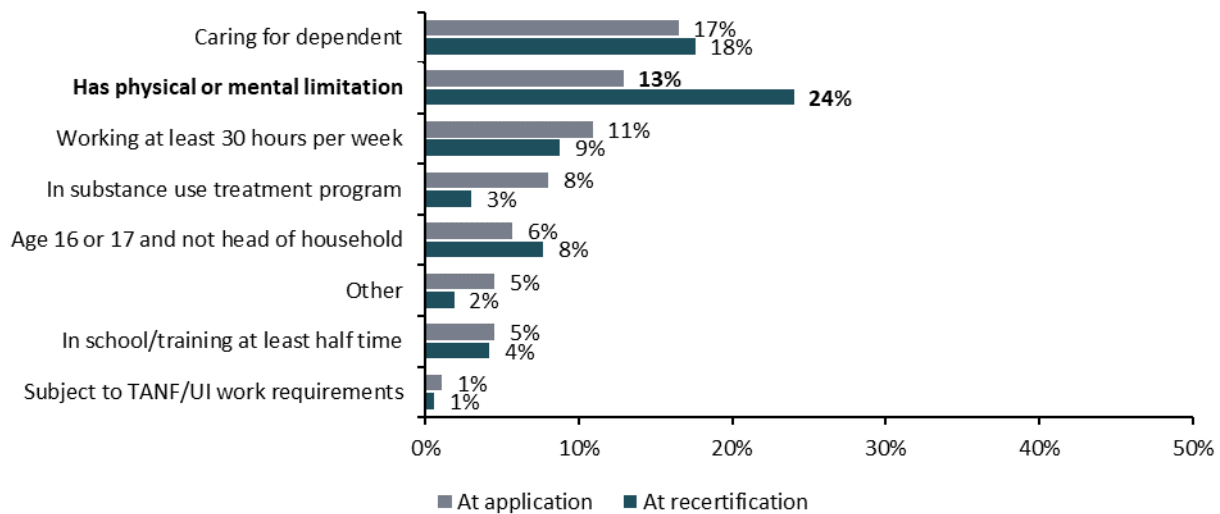
Figure 3.1. Determination at Application and Recertification: Not Subject to Work Requirements



At application N = 208,155; At recertification N = 280,083
Source: Mathematica analyses of Georgia administrative SNAP data (November 2022-January 2023)

The presence of a physical or mental limitation was the second most common reason why all applicants ages 16-59 were determined not to be subject to work requirements at application, after caring for a child under age 6 or an incapacitated person. Nearly 13 percent of all applicants were not subject to work requirements because of a physical or mental limitation (see figure 3.2). At recertification, the percentage was almost twice as high (24 percent). At recertification, unlike at application, physical or mental limitations were the most prevalent reasons why individuals ages 16-59 were determined not subject to work requirements. A higher percentage of individuals may have been determined to have physical and mental limitations at recertification than at application for several reasons. For example, some of those who were physically and mentally able to work may have found employment before recertification and left SNAP, resulting in a greater proportion of adults on the caseload at recertification who were unfit. Additionally, disabling conditions may have surfaced as eligibility workers or E&T service providers got to know participants or as participants who did not initially reveal their conditions were unable to meet work requirements and subsequently granted exemptions or exceptions because of their limitations.

Figure 3.2. Reasons for Being Determined Not Subject to Work Requirements, All Individuals Ages 16-59



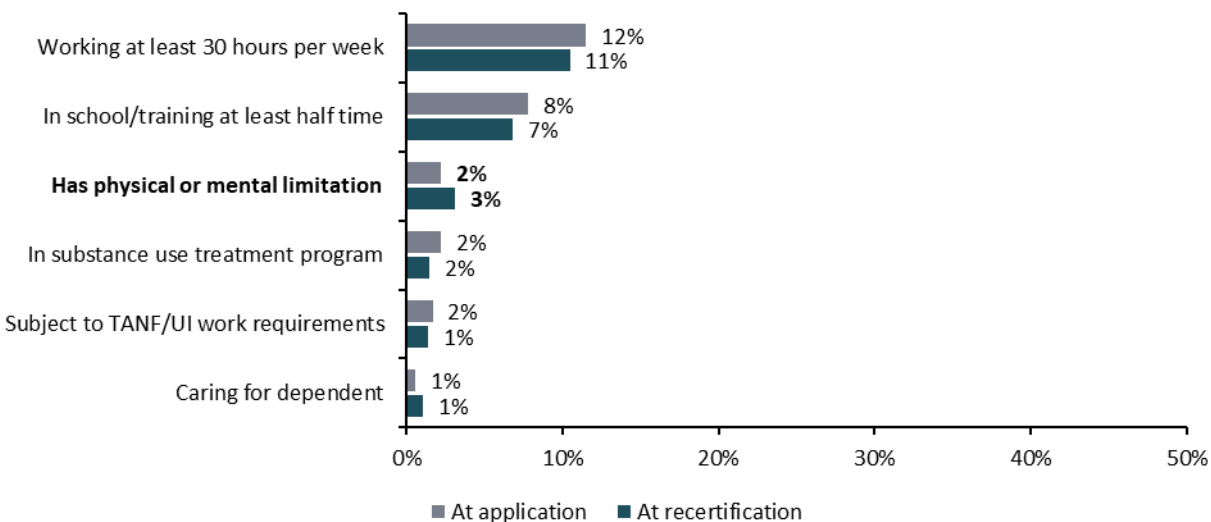
At application N = 208,155; At recertification N = 280,083

Note: Almost all individuals with physical or mental limitations (99 percent) were coded as “receiving disability benefits” rather than “unfit for employment” (not shown). Almost three-quarters of those with physical or mental limitations personally receive Social Security or SSI benefits. It is impossible to know whether some coded as “receiving disability benefits” received other types of disability benefits, such as Veteran’s Benefits or Workers Compensation, or whether they were unfit for other reasons but erroneously coded as receiving disability benefits.

Source: Mathematica analyses of Georgia administrative SNAP data (November 2022-January 2023)

Individuals who were not subject to the general work requirements due to physical or mental limitations were not considered ABAWDs. As a result, very few individuals who met the ABAWD definition (2-3 percent) were determined not subject to the ABAWD time limits because of a physical or mental limitation at application or recertification (figure 3.3). The reason we saw any ABAWDs considered unfit due to a physical or mental limitation reflected the somewhat more generous definition of physical and mental limitations in Georgia for exceptions from ABAWD work requirements than for exemptions from general work requirements (i.e., exceptions included all pregnancies rather than only high-risk pregnancies, and unlike for exemptions, exceptions did not qualify what was meant by “physically or mentally unfit for employment” or “homeless”). The most common reason for exceptions was employment; almost half of ABAWDs with an exception were already working the requisite number of hours per week.

Figure 3.3. Reasons for Being Determined Not Subject to Work Requirements, ABAWDs



At application N= 59,729 at application; at recertification N = 40,164

Note: Twenty-three individuals were coded as age 16 or 17 and not the head of household at application and 6 at recertification, too few to result in a non-zero percentage. Eleven individuals were coded as having other exemption reasons at recertification, too few to result in a non-zero percentage. Both determinations reasons were omitted from the figure.

Source: Mathematica analyses of Georgia administrative SNAP data (November 2022-January 2023)

3.B.2 Patterns in Determinations at Application

Key findings from an analysis of patterns in fitness for work determinations include the following (table 3.2). Additional information and supplemental tables on patterns at application and recertification can be found in Appendix D.1.

Community characteristics. Patterns in fitness for work determinations did not vary by the characteristics of the communities in which SNAP applicants lived (specifically, their urbanicity, employment rate, and average income).

Income. As would be expected given the definition of “unfit for work,” applicants who earned personal income were rarely determined unfit for work because of a physical or mental limitation (two percent). Conversely and also as would be expected, most individuals receiving disability benefits through Social Security or SSI (72 percent) were determined unfit because of a physical or mental limitation. The vast majority of the rest of those receiving income from these sources were coded in Georgia’s data system as excused from work requirements because of other reasons (only one percent were determined subject to work requirements; appendix table D.1g.). Likely as a result of their income from disability benefits and potentially other household members, applicants with higher household gross incomes (over 50 percent of the federal poverty level) were determined unfit for work because of a physical or mental limitation more often than those with lower household incomes.

Household structure. Applicants living with children were much less likely than those without children in their households to be determined unfit for work because of a physical or mental limitation. In fact, those with children were much less likely than those without to be determined subject to work requirements at all, but in most cases, the reason was something other than a physical or mental limitation—most likely caring for a dependent (appendix table D.1e.). Only eight percent of the small number of applicants coded as homeless in the eligibility and benefit

determination system were determined unfit for work because of a physical or mental limitation.²⁸ Another 20 percent were determined not subject to work requirements for other reasons. These percentages likely reflected Georgia's policy at the time of data collection of automatically excusing from the work requirements (both general and ABAWD) only those who were chronically homeless, not all applicants who were homeless.²⁹

Disability status. Among those coded as having a disability, nine percent were determined subject to work requirements.³⁰ Possibly, SNAP eligibility workers found these applicants' specific disabilities did not interfere with applicants' ability to work. Among those who were not coded as having a disability, a small number were determined not subject to the work requirements because of a physical or mental limitation (two percent). Possibly, eligibility workers mistakenly did not code some of these applicants as having a disability.

Other demographic characteristics. Males were seven percentage points more likely than females to be determined unfit for work because of a physical or mental limitation while females were more likely than males to be determined not subject to work requirements for other reasons. In addition, older applicants (46 to 59 year olds) were 22 percentage points more likely than younger applicants (16 to 30 year olds) to be determined unfit because of a physical or mental limitation, while applicants on the younger end were much more likely than those on the older end to be determined not subject to work requirements for other reasons. Results may have been driven by a relatively higher percentage of females and younger applicants caring for a child under six or an incapacitated person. The percentage of missing data (20 percent among all applicants aged 16-59) was too high to meaningfully interpret patterns in determinations by race; applicants of Hispanic or Latino origin were determined unfit because of a physical or mental limitation less often than others.³¹

²⁸ About two percent of applicants ages 16-59 (4,734 of 208,155) were coded in Georgia's data system as homeless in a separate field from exemption and exception reasons.

²⁹ The Georgia administrative data reflect SNAP applications submitted during a three-month period prior to the enactment of the 2023 Fiscal Responsibility Act, which amended the 2008 Act to excuse individuals experiencing homelessness from the ABAWD work requirement and time limit. About 3 percent of ABAWDs who were coded in Georgia's data system as homeless in a separate field from exemption and exception reasons were determined unfit for work because of a physical or mental limitation at application (not shown).

³⁰ About 16 percent of applicants ages 16-59 (33,710 of 208,155) were coded in Georgia's data system as having a disability in a separate field from exemption and exception reasons.

³¹ State SNAP administrative data systems typically contain a high percentage of missing data for race and ethnicity variables because these data were not required to determine program eligibility and benefits and were optional for applicants and participants to disclose.

Table 3.2 Determinations at Application, by SNAP Applicant Characteristics

	Percentage of individuals ages 16 to 59 determined not subject to work requirements because of a physical/mental limitation	Percentage of individuals ages 16 to 59 determined not subject to work requirements for other reasons	Percentage of individuals ages 16 to 59 determined subject to work requirements	Number of individuals ages 16 to 59
Urbanicity of applicant’s zip code				
Metropolitan	12.4	43.9	43.7	168,993
Micropolitan	15.0	44.5	40.5	26,617
Rural	15.0	43.4	41.6	12,365
Unemployment in applicant’s zip code				
Less than 10%	12.7	44.3	43.1	185,254
10% or greater	14.1	41.2	44.8	20,354
Avg. income in applicant’s zip code				
Below State median	13.6	43.3	43.1	144,600
Above State median	10.9	45.7	43.3	60,258
Gross household income as percentage of the federal poverty level				
0	1.8	27.5	70.6	78,716
1-25	2.1	48.3	49.6	20,160
26-50	11.2	46.4	42.4	24,579
51-75	34.3	45.0	20.7	35,999
76-100	18.6	66.5	14.9	28,420
101-130	17.6	70.8	11.6	17,709
130+	57.3	38.1	4.6	2,572
Personal earnings				
Yes	2.1	78.5	19.5	43,812
No	15.8	34.8	49.5	164,343
Personal Social Security or SSI income				
Yes	72.0	26.6	1.4	33,182
No	1.7	47.2	51.1	174,973
Children (under age 18) in household				
Single adult	4.3	70.4	25.2	70,278
Multiple adult	5.0	52.3	42.8	33,484
No children in household				
Single adult	21.6	22.7	55.6	91,589
Multiple adult	18.0	28.2	53.8	12,663
Homeless				
Yes	8.1	20.4	71.4	4,734
No	13.0	44.5	42.5	203,421
Coded with a disability				
Yes	67.8	23.4	8.8	33,710
No	2.3	47.9	49.8	174,445
Gender				
Female	10.4	51.5	38.1	132,580
Male	17.3	30.7	52.1	75,568
Age				
16 to 30	5.5	59.2	35.5	82,985
31 to 45	11.4	38.3	50.3	74,991
46 to 59	27.3	27.1	45.6	50,179
Ethnicity				
Hispanic or Latino	3.8	48.7	47.5	5,206
Not Hispanic/Latino	13.7	43.5	42.8	180,768
Other	6.9	47.8	45.3	15,561
Total N	28,411	89,898	89,846	208,155

Source: Mathematica analyses of Georgia administrative SNAP data (November 2022-January 2023)

Note: Except for ethnicity, missing data range from zero to three percent. Some row percentages sum to more than 100 due to rounding.

3.B.3 Differences in Determination Patterns at Application and Recertification

Patterns in determinations at recertification mirrored patterns at application with the following notable exceptions or ways in which application patterns became more pronounced. Appendix D.1 provides supplemental tables.

- A substantially higher percentage of individuals without children in their households were determined unfit for work because of a physical or mental limitation at recertification than at application (49 and 22 percent, respectively, for those in single adult household; 34 and 18 percent, respectively, for those in multiple adult households).
- The proportion of males determined unfit for work was much higher at recertification than at application (31 and 17 percent, respectively).
- Relatively older applicants (ages 46 to 59) were determined not subject to work requirements because of a physical or mental limitation at a much higher rate at recertification than at application (49 compared to 27 percent).
- A higher percentage of individuals ages 16-59 were coded as having a disability at recertification than at application (16 compared to 24 percent). Additionally, a much higher percentage of them were determined unfit because of a physical or mental limitation at recertification than at application when other reasons were much more prevalent.

3.C. Good Cause Determinations

Georgia's SNAP policy manual indicated that eligibility workers assessed good cause prior to applying a sanction for failing to comply with work requirements. As stated in the policy manual, someone subject to the general or ABAWD work requirements may have received a good cause determination because of "illness, either temporary or permanent" or "illness of another household member that requires the presence of the mandatory registrant or ABAWD." Other allowable reasons for good cause included a household emergency, unavailability of transportation, barriers beyond an individual's control, and specified reasons for leaving a job unrelated to fitness for work as well as temporary absences from work due to holidays or breaks or due to workload.

Eligibility workers and managers described the process for implementing good cause determinations differently from how it was described in the policy manual. Eligibility workers reported that they screen applicants for good cause during the initial eligibility and recertification interview and that they followed the same processes for determining good cause that they did to determine exemptions and exceptions. They reported that good cause determinations were made when mental or physical limitations were a short-term condition with a set end date (for example, someone who broke their leg and is on crutches for a month), while exemptions and exceptions were made for longer-term conditions.

SNAP Works employment specialists and managers, who were employed by OFI, described the process for implementing good cause determinations as it was described in the policy manual. Unlike exemptions or exceptions, they reported being able to make good cause determinations in Gateway. They reviewed information entered by SNAP Works providers in CaseWorthy, including if participants met hours requirements and reasons for not meeting requirements within the case notes. If a participant had a reason for good cause, SNAP Works employment specialists indicated the determination by choosing from a pre-defined list of good cause reasons in Gateway. Employment specialists tried to select the reason that most closely aligned with the situation

described by the SNAP Works provider in the CaseWorthy case notes. Though SNAP Works employment specialists could make good cause determinations in Gateway, only eligibility workers could update the ABAWD time clock in Gateway. SNAP Works providers, who OFI contracted with to provide E&T services, did not have access to Gateway and did not have the authority to make good cause determinations.

3.D. Challenges and Key Takeaways

Staff reported several challenges with making determinations, including insufficient staffing, limited training and guidance, and the inability to collect enough information through phone interviews. Inconsistencies in determining exemptions and exceptions and confusion around good cause were key themes discussed across staff.

3.D.1 Challenges

Limited information from phone interviews. Fitness for work had been harder to determine since phone interviews largely replaced in-person interviews. Respondents described that it was often easier to make exemption and exception determinations if the eligibility workers conducted interviews in person because many limitations could be verified visually (e.g., applicant on crutches).

Insufficient staffing. One local administrator noted that the biggest challenge in making fitness for work determinations was not having enough staff to have effective conversations with SNAP applicants and participants. Eligibility workers were trying to hurry to ensure everyone received their benefits while also engaging applicants and participants in in-depth conversation to assess physical and mental limitations.

Limited training and guidance for making determinations. Staff mentioned that the guidelines they followed for eligibility interviews were generally helpful but did not provide enough detail on exemptions and exceptions. One local administrator reported wishing there were more trainings and procedures in place regarding exemptions, exceptions, and good cause determinations for mental limitations.

3.D.2 Key Takeaways

Inconsistencies among eligibility workers in determining exemptions and exceptions.

Eligibility workers typically used their best judgement on what qualified for an exemption or exception, which sometimes led to inconsistencies among staff. One respondent described an instance when one eligibility worker conferred with another about an applicant's reported disability for which they could not provide a doctor's note; one worker believed that the applicant should have been exempt from the general work requirements and the other that an exemption should not have been granted without other verification. The assigned eligibility worker granted the exemption; the other eligibility worker would not have done the same.

"We do have guidelines, but it doesn't touch a lot on what to do for chronic homelessness or exemptions. It's a gut feeling."

—Eligibility worker

Eligibility workers primarily relied on eligibility interviews to determine if someone was eligible for an exemption or exception. Additional training and guidance on what probes eligibility workers

should ask surrounding physical and mental limitations could have helped limit inconsistencies in determinations across eligibility workers.

Importance of interview probes for making determinations. Now that most interviews take place over the phone, eligibility workers described asking more probing questions to try to identify potential limitations they could not observe visually. Eligibility workers explained that describing the work requirements often prompted applicants to disclose limitations they may have. In addition, probing on individual's housing situation during eligibility interviews could have unearthed information on potential physical or mental limitations that might have made someone eligible for an exemption from the general work requirements. While homelessness itself, unless chronically homeless, was not a reason for an exemption, eligibility workers described that being homeless, chronically or otherwise, often coincided with having a physical or mental limitation.

Confusion around good cause determinations. Eligibility workers' understanding of good cause determinations differed from policies outlined in the policy manual. Eligibility workers described length of time being the distinguishing factor, with good cause determinations being short-term or temporary, and reported the processes for determining exemptions/exceptions and good cause determinations both occurring at initial application or recertification. However, the policy manual indicated that eligibility workers assess good cause prior to applying a sanction for failing to comply with work requirements. It should be noted that eligibility workers have not had to apply good cause since the onset of the COVID-19 pandemic when time limits for ABAWDs were waived. Workers with pre-pandemic experience applying good cause may have needed more refresher trainings on policies and procedures. Eligibility workers hired while these requirements were waived did not have any experience applying policies and procedures at the time of study data collection.

4 Maryland Case Study

Maryland’s Department of Human Services (DHS) administered the State’s SNAP program in partnership with the 24 Local Departments of Social Services (LDSS). LDSSs determined eligibility for SNAP and processed applications, including determining exemptions and exceptions, for applicants and participants living in their jurisdiction. Policies and processes surrounding fitness for work determinations were informed by federal policies and regulations and were intended to be applied uniformly across the State. However, some discrepancies existed, including when eligibility workers required verification for a physical or mental limitation and the use of good cause determinations.

This chapter provides an overview of Maryland’s policies and processes surrounding fitness for work determinations and good cause determinations at the time of the site visit in October 2023, and trends in fitness for work determinations based on all individuals ages 16-59 in all households that received a SNAP benefit in any month between September through November 2023.

4.A. Fitness for Work Determinations

Maryland’s policies and guidelines related to making fitness for work determinations due to physical and mental limitations came from FNS guidance. Changes related to exemptions or exceptions due to physical or mental limitations only occurred when there were changes to Federal policies or regulations. State staff noted that DHS updates the policy manual regularly due to changes at the Federal level (e.g., changes to the ABAWD age limit). At the time of the site visit, Maryland DHS most recently updated the policy manually in July 2023.

4.A.1 Defining Fitness for Work Determinations

Maryland’s SNAP Program Manual outlined two types of work requirement exemptions and exceptions—statutory and individual exemptions. Table 4.1 provides an overview of Maryland’s statutory exemptions for the general work requirements and exceptions for the ABAWD work requirements, related to being physically or mentally unfit for work.

Table 4.1: Maryland Statutory Exemption and Exception Criteria for being Physically or Mentally Unfit

Criteria	Exemption from General Work Requirements	Exception from ABAWD Work Requirements
Receipt of temporary or permanent disability benefits	◆	◆
Provides verification (a statement from a health care provider)	◆	◆
Have an obvious long-term (90 days or more) or short-term (less than 90 days) disability		◆

Source: Maryland SNAP Manual

If someone did not qualify for a statutory exemption or exception, eligibility workers determined if they qualified for an individual exemption on a case-by-case basis. Even if an applicant had a condition that could be considered for an individual exemption, it did not mean that they would automatically receive it. Individual exemptions related to being unfit for work included multiple barriers to employment (e.g., transportation barrier, alcohol or drug abuse), experiencing

homelessness, temporary illness or disability, expected to return to work within three months or less, and pregnancy.

4.A.2 Communicating Policies and Guidance for Making Fitness for Work Determinations

Maryland DHS used a variety of methods to communicate policies and processes with LDSS office staff. DHS sent action transmittals, which outline actions that LDSS staff must take for local agency supervisors; supervisors then relayed information to eligibility workers. Prior to DHS sending an action transmittal, an internal standing policy group, which included State officials from different DHS departments, reviewed the document for any necessary changes. DHS sent information memos to LDSS offices to provide additional information and guidance without requiring specific actions to be taken. All action transmittals, informational memos, the SNAP Program Manual, and other relevant policy documents were saved in an online database called Knowledge Base. Whenever an action transmittal or information memo was issued, DHS sent the guidance in an email attachment, along with a link to Knowledge Base. This method allowed staff to access the most recent action transmittal or memo, as well as past communication all in one place. DHS held monthly SNAP It Up workgroups with State E&T program, known as Food Supplement Employment and Training Services (FSET), and local agencies to answer policy questions and share updates.³² These work groups also allowed FSET providers to get to know individual eligibility workers.

Trainings

State and local staff reported that there were not specific trainings on making exemptions from the general work requirements or exceptions from the ABAWD work requirements due to physical or mental limitations. However, the DHS training department offered a variety of training courses that covered the process for screening SNAP applicants and participants and how and when to refer them to proper work activities. For example, “Connect the Dots Trainings” were mandatory trainings for all local agency staff and happened quarterly. These trainings covered a range of policy topics, including how to screen for work requirements, and allowed eligibility workers to ask questions and seek clarification on policies and procedures. In addition, after the end of the COVID-19 public health emergency, there was a Statewide ABAWD training for all eligibility staff to get training on ABAWD requirements.³³

DHS offered voluntary policy refresher trainings to all staff and administers it through an online training portal that allowed staff to complete self-guided trainings as needed. Eligibility workers were also able to submit policy questions to DHS on an ad hoc basis through an online Google Q&A form; DHS typically responded to questions within a week.

³² DHS partners with Third Party-Partners to operate FSET. As of 2023, there were roughly 30 partners that contracted with DHS to provide E&T services. Some of these partners have multiple sites throughout the State (e.g., American Job Center).

³³ At the time of the site visit (October 2023), Maryland had an ABAWD time limit waiver in place in five jurisdictions. For individuals not covered under the waiver, Maryland used discretionary exemptions to cover all remaining ABAWD cases at the time of the site visit. Discretionary exemptions allow State agencies, at its discretion, to extend SNAP eligibility to a limited number of ABAWDs subject to the time limit. Each discretionary exemption extends eligibility to one ABAWD for one month. FNS calculates and issues discretionary exemptions on an annual basis based on a percentage of the covered individuals in the State. Maryland was in the process of retraining staff on ABAWD requirements so they would be prepared to apply these policies once the time limit waiver expired. Maryland stopped using discretionary exemptions to cover cases not covered under the waiver on December 31, 2023.

4.A.3 Process for Making Fitness for Work Determinations

While local staff were supposed to apply policies surrounding exemptions and exceptions uniformly across the State, LDSS offices had the flexibility to execute the policies depending on the structure of their jurisdiction. For example, one local agency may have used a task-based approach where eligibility workers focused on one task (e.g., intake, recertification) while another may have required eligibility workers to perform all tasks.

The process for determining exemptions from the general work requirements was the same as making exceptions from the ABAWD work requirements.

Making determinations at initial application

Application. Applicants applied to the program in a variety of ways, including through the online portal, paper application sent via mail, at the local DSS office with the assistance of an eligibility worker, or with the assistance of a community-based provider. Community-based providers had access to a separate portal they used to help individuals apply. They could also help people fill out a paper application and scan or fax the application to the local office. Regardless of how an individual applied, they were asked about having a disability on the application. There were also questions that might indicate one has a disability, including providing information on disability related income and benefits (e.g., Social Security Disability) and medical expenses for anyone who is at least 60 years of age or disabled.

Once an applicant completed an application, they were registered in the case management system known as Eligibility and Enrollment (E&E). E&E contained a tool to help eligibility workers identify ABAWDs based on information entered into the system. Eligibility workers inputted information on physical or mental limitations on a Health and Disability screen within the E&E system. Staff entered data on the timeframe of the disability but not the specific type of disability.

Interview. While Maryland did not require interviews at the time of the site visit, staff at both local offices completed interviews.³⁴ State staff noted that they encouraged eligibility workers to start conducting eligibility interviews while the interview waiver was still in place so that participants could get back in the habit of completing eligibility interviews. Applicants could complete interviews over the phone or in person. There was no difference in the screening process for work requirements based on the mode of interview; eligibility workers were required to ask the same questions regardless of interview mode.

Verification. The E&E system automatically accessed the Social Security Administration (SSA) to determine if someone was receiving temporary or permanent disability benefits; those who were receiving disability benefits were excused from the general and ABAWD work requirements. For applicants who were not receiving disability benefits, the verification requirements varied across the State. Staff at the urban site reported that verification was always required to be excused from the general and ABAWD work requirements. Eligibility workers provided applications with a “500-C medical form.” The medical form required a medical professional to indicate if an individual had a physical or mental limitation that would prevent an individual from working or participating in a training or educational activity and how long the disability was expected to last. Applicants had 60 days to have the form completed by a health care provider to receive the exemption or exception. Applicants could submit the form online through the portal, in person, or by email. If the verification was submitted in person, eligibility workers would scan the document into the E&E

³⁴ Maryland was approved to waive the interview requirements for initial application and recertification until Spring 2024.

system. Once verification was received, eligibility workers could determine if an individual should be excused from work requirements.

Staff at the rural site only required verification if it was unclear to the staff if an individual had a disability, which allowed staff discretion in granting exemptions and exceptions. For example, staff would first go through the list of allowable statutory exemptions and exceptions to determine if an applicant qualified. If a person's situation was unclear, eligibility workers would follow up with probing questions during the interview and possibly request additional verification. Staff noted that some participants would have rather had a medical professional complete the medical form, regardless of disability, rather than discussing the disability with the eligibility worker. Eligibility workers also noted that while they did not want to overburden applicants, sometimes it was best to get formal verification so they could have documentation on record, leaving no question about the exemption. In addition, there were several mental health organizations that served people whose incomes are below the federal poverty threshold in the area; if an applicant indicated that they worked with one of these organizations, eligibility workers could reach out to an applicant's case manager at the organization to verify a limitation if the applicant gave them permission.

Determination. Staff either made the determination after the interview, if verification was not required, or upon receiving the verification. Eligibility workers made the final determination on exemptions and exceptions; supervisors did not need to approve the decision. In some local offices, eligibility supervisors reviewed a random sample of determinations to ensure eligibility workers were implementing policies correctly. Eligibility workers may have also sought out additional guidance when a decision was unclear.

Making determinations at recertification

Maryland's process for making a fitness for work determination at recertification was similar to the process at application. Participants completed recertification at either six or 12 months, depending on the local jurisdiction. For example, the urban site reported that most certification periods were six months while the rural site indicated they were 12 months. For both six- and 12-month certification periods, participants resubmitted any necessary verifications (e.g., 500-C medical form). When participants were required to complete interviews, they could be completed over the phone or in person. Eligibility workers conducted a reassessment for participants who were excused from the work requirements during the prior reporting period to see if anything had changed since the last application. At the rural site, eligibility workers noted that when a mental or physical limitation was not obvious, they would require participants to fill out another medical form to verify physical or mental limitations. At the urban site, participants must have resubmitted the medical form at recertification.

Making determinations at other times

There were several situations when participants may have requested an exemption or exception from the work requirements outside of the application and recertification process. For example, if an individual has a 12-month certification period, they were required to complete a Maryland Benefit Review Form (MBR), which is a mid-point review to confirm eligibility. The MBR form asked participants if there were any major changes to the household. While the form did not explicitly ask about changes in disability status, it did require participants to report on changes to household earned income and hours worked in the last six months. If participants reported a change, eligibility workers may have reassessed an individual's work requirement and asked for any necessary verification that may have led to an exemption or exception. Participants could have also requested

eligibility workers to reevaluate their work requirements at any time if they developed a physical or mental limitation during the certification period. In these cases, it was up to the participant to return to the eligibility worker and indicate that they needed an exemption or exception.

Individuals participating in FSET may have also needed to contact an LDSS office to inform eligibility workers they could participate in an E&T activity and needed an exemption or exception. FSET providers did not determine exemptions or exceptions when an E&T activity was not appropriate for the participant. When a participant joined a work activity, provider staff requested participants complete a form and interview to gather basic information (e.g., address, work history). At this point, they discussed any physical or mental limitations that may have prevented them from completing the E&T activity or working. If a participant reported physical or mental limitations during the orientation interview, or once the E&T activity had begun, the provider would remove them from the program and include a note in the Work Opportunities Record Keeping System (WORKS). Providers did not typically communicate with the SNAP local office when this happened since many participants did not have a designated SNAP eligibility worker. FSET staff would inform the participant that they must contact an eligibility worker to be evaluated for an exemption or exception.

4.A.4 Appealing Fitness for Work Determinations

Participants had the right to appeal the determination for both general and ABAWD work requirements if they did not agree with a determination. However, staff noted it was not common for applicants to appeal a fitness for work determination since applicants always had the option to submit verification. To complete an appeal, applicants must complete a request for hearing form and submit it to their local office. The Office of Administrative Hearings then scheduled a hearing. Some local offices had a local administrator review the appeal and meet with the applicant or participant to see if they could resolve the issue internally rather than going to a hearing. One local administrator noted that this allowed the customer to feel heard and often led to a resolution without having to go to the hearing. If the participant still wanted to move forward with the appeal, a judge would meet with the eligibility supervisor and participant to resolve the issue.

4.B. Trends in Fitness for Work Determinations

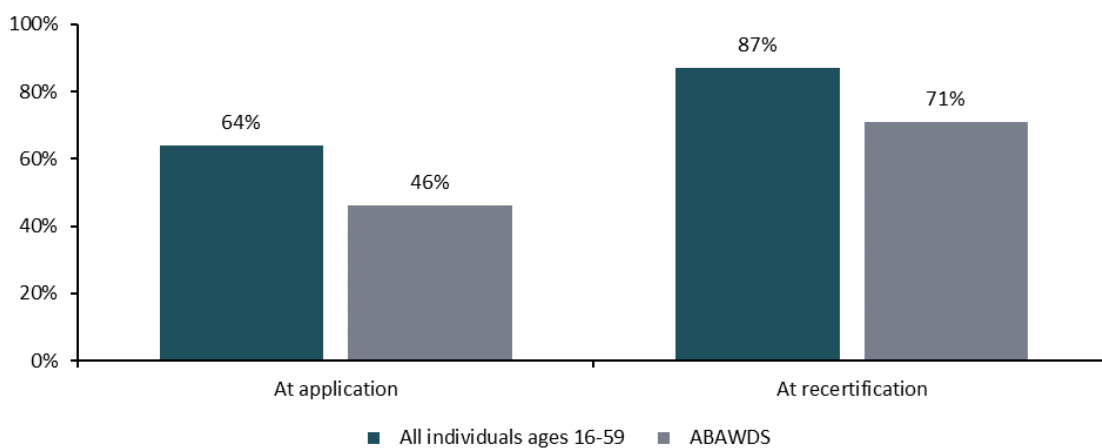
This section presents findings from the administrative data analysis in Maryland, which included all individuals ages 16-59 in all households that received a SNAP benefit in any month between September through November 2023. Application data reflected the application for the household's current spell on SNAP. Recertification data were for individuals in households that had been on SNAP long enough as of November 2023 to have gone through at least one recertification; data reflected the household's most recent recertification. Unlike in the analysis of administrative data in Georgia, Texas, and Wisconsin (where the analysis of application included only individuals in households that had not yet had a recertification), the Maryland analysis of applications included individuals in every household that were on the caseload at any point during the three-month window. Thus, in Maryland, individuals with recertifications were a subset of individuals with applications and enabled an analysis of changes in fitness for work determinations over time. As in Georgia and Texas, Maryland's eligibility and benefit determination system allowed eligibility workers to code only one reason why an individual may have been determined not subject to work requirements. Thus, the percentage of individuals determined not subject to work requirements

because of a physical or mental limitation presented in this section might have been lower than the actual percentage of individuals with physical or mental limitations.

4.B.1 Determinations at Application and Recertification

Almost two-thirds of all individuals ages 16-59 were determined not subject to work requirements at application (64 percent; figure 4.1). The percentage was higher at recertification (87 percent). About one-quarter of all applicants ages 16-59 (95,820 of 372,765) and 16 percent of participants with a recertification (20,065 of 126,043) met the definition of an ABAWD by virtue of their age, disability status, and presence of children in the household (appendix tables D.2a and D.2b.). Just under half (46.4 percent) and almost three-quarters (70.7 percent) were not subject to the ABAWD time limits at application and at recertification, respectively.

Figure 4.1. Determination at Application and Recertification: Not Subject to Work Requirements

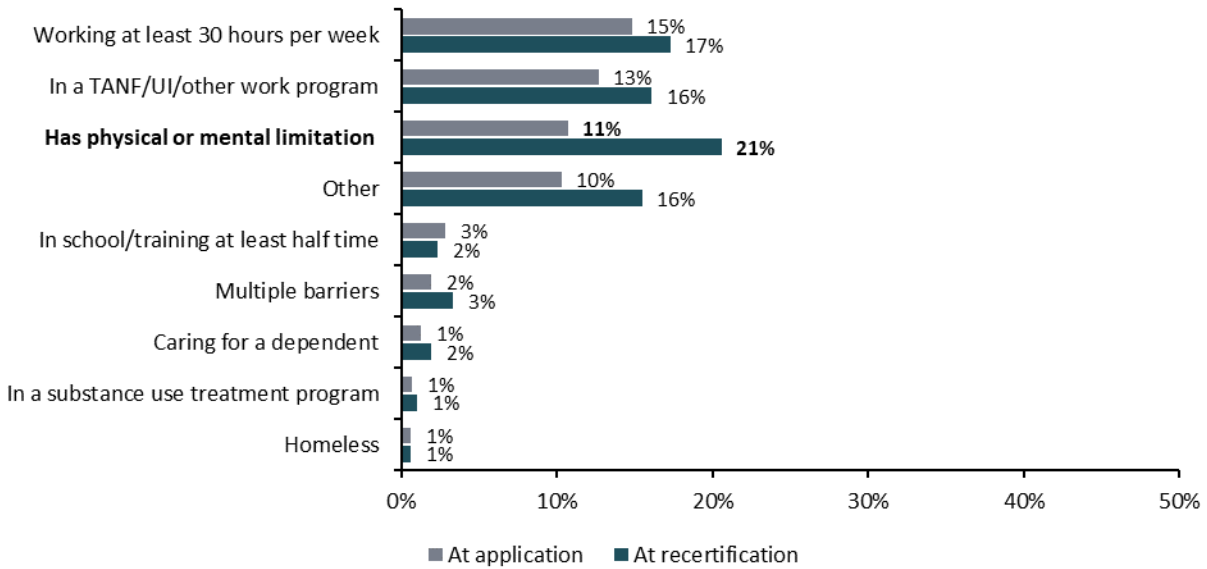


At application N= 372,765 at application; at recertification N = 126,043 at recertification
 Source: Mathematica analyses of Maryland administrative SNAP data (August 2023-October 2023)

The increase in the percentage of individuals ages 16-59 excused from work requirements between application and recertification was due largely to an increase in the percentage of participants determined unfit for work because of a physical or mental limitation at recertification (figure 4.2). The presence of a physical or mental limitation was one of four primary reasons why applicants were determined to be not subject to work requirements, along with already being employed the equivalent of 30 hours per week, already participating in a work program through TANF or UI, and a host of other unspecified reasons. Just over 10 percent of all applicants were not subject to work requirements because of a physical or mental limitation. At recertification, a physical or mental limitation was the most common reason individuals ages 16-59 were determined not subject to work requirements (21 percent of all participants). Surprisingly, few applicants were excused because of caring for a dependent. Some of those caring for a dependent may have been coded as exempt because they were subject to the TANF program work requirements. It is surprising that 13 percent of applicants were excused because they were subject to the TANF or UI program work requirements; in FY 2022, only 3 percent of all SNAP households in Maryland had TANF income and 2 percent of SNAP household nationally received Unemployment Insurance.³⁵

³⁵ U.S. Department of Agriculture, Food and Nutrition Service, Office of Policy Support, Characteristics of Supplemental Nutrition Assistance Program Households: Fiscal Year 2022, by Mia Monkovic. Project Officer, Aja Weston. Alexandria, VA, 2024.

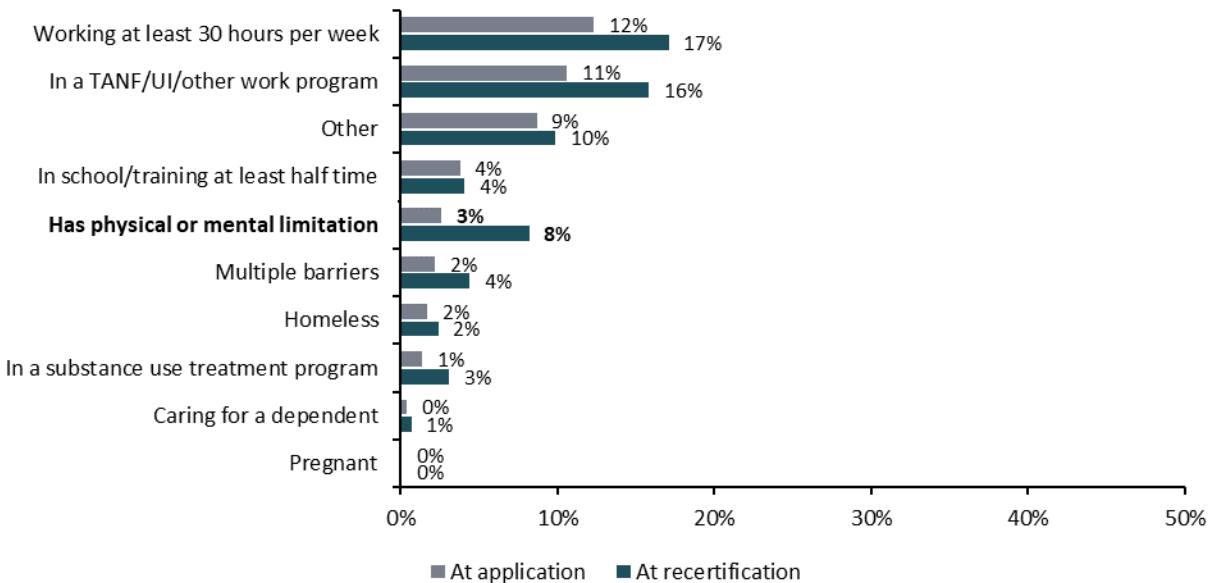
Figure 4.2. Reasons for Being Determined Not Subject to Work Requirements, All Individuals Ages 16-59



At application N= 372,765; at recertification N =126,043
 Note: Less than one percent of individuals were coded as pregnant. Therefore, the classification was omitted from the figure.
 Source: Mathematica analyses of Maryland administrative SNAP data (August 2023-October 2023)

Very few ABAWDs (3 percent) were determined not subject to the time limits at application because of a physical or mental limitation beyond that which would exempt them from the general work requirement (figure 4.3). At recertification, the percentage increased over threefold.

Figure 4.3. Reasons for Being Determined Not Subject to Work Requirements, ABAWDs



At application N = 95,820; at recertification N = 20,065
 Note: Less than one percent of individuals were coded as pregnant.
 Source: Mathematica analyses of Maryland administrative SNAP data (August 2023-October 2023)

4.B.2 Patterns in Determinations at Application

Key findings from an analysis of patterns in fitness for work determinations include the following (table 4.4). Additional information and supplemental tables on patterns at application and recertification can be found in Appendix D.2.

Community characteristics. Patterns in fitness for work determinations did not vary by the characteristics of the communities in which SNAP applicants lived (specifically, their urbanicity, employment rate, and average income).

Income. As would be expected given the definition of “unfit for work,” relatively few applicants with personal earned income were excused from work requirements because of a physical or mental limitation. About two-thirds of those with personal income from Social Security or SSI were excused because of physical or mental limitations. The rest who had income from these sources were evenly divided between those who were excused for other reasons and those who were subject to work requirements. It was unclear why a non-trivial percentage (16 percent) of individuals with disability benefits would be determined subject to the work requirements. Considering all income sources, individuals in households who had gross income in the mid-range of the income distribution (51-75 percent of the federal poverty level) were much more likely to be determined unfit for work because of a physical or mental limitation than individuals in households who had higher or lower gross income.

Household structure. Applicants who lived with children were rarely excused from work requirements because of a physical or mental limitation. About two-thirds were excused for other reasons, but as suggested in Figure 4.2, rarely because of caring for a dependent. Forty-two percent of applications who were coded as homeless in the State’s data system were determined subject to work requirements. Those who were coded as homeless were determined unfit for work because of a physical or mental limitation at similar rates as those who were not coded as homeless.³⁶

Disability status. Among those coded as having a disability, 28 percent were determined subject to work requirements.³⁷ Possibly, SNAP eligibility workers found that these applicants’ specific disabilities did not interfere with applicants’ ability to work. Among those who were not coded as having a disability, very few were determined not subject to the work requirements because of a physical or mental limitation (two percent). Possibly, eligibility workers mistakenly did not code some of these applicants as having a disability.

Other demographic characteristics. Females were determined subject to work requirements somewhat less often than males (33 and 42 percent, respectively). The difference was due to reasons other than physical or mental limitations. Across all age groups, just over one-third of applicants were determined subject to work requirements. Among those who were excused, applicants who were relatively older were much more likely to be determined unfit for work because of a physical or mental limitation. There were no differences that existed in determinations across different racial groups. The percentage of missing data on ethnicity, however, (29 percent among all applicants ages

³⁶ About six percent of applicants ages 16-59 (22,995 of 372,765) were coded in Maryland’s data system as homeless in a separate field from exemption and exception reasons. The application dates included in the Maryland analysis range from July 1, 1981 to October 31, 2023 (with an approximate mean of December 1, 2021). Most applications in the analysis were processed before enactment of the 2023 Fiscal Responsibility Act, which amended the 2008 Act to excuse individuals experiencing homelessness from the ABAWD work requirement and time limit. About 4 percent of ABAWDs who were coded in Maryland’s data system as homeless in a separate field from exemption and exception reasons were determined unfit for work because of a physical or mental limitation at application (not shown).

³⁷ About 19 percent of applicants ages 16-59 (70,877 of 372,765) were coded in Maryland’s data system as having a disability in a separate field from exemption and exception reasons.

16-59) was too high to meaningfully interpret patterns for those who were or were not Hispanic or Latino.

Key findings from an analysis of patterns in fitness for work determinations include the following (table 4.2). Additional information and supplemental tables on patterns at application and recertification can be found in Appendix D.2.

Table 4.2. Determinations at Application, by SNAP Applicant Characteristics

	Percentage of individuals ages 16 to 59 determined not subject to work requirements because of a physical/mental limitation ^a	Percentage of individuals ages 16 to 59 determined not subject to work requirements for other reasons	Percentage of individuals ages 16 to 59 determined subject to work requirements	Number of individuals ages 16 to 59
Urbanicity of applicant's zip code				
Metropolitan	10.8	52.2	36.5	357,230
Micropolitan	11.1	55.2	33.7	8,139
Rural	10.7	55.4	33.9	7,295
Unemployment in applicant's zip code				
Less than 10%	10.6	52.6	36.8	347,494
10% or greater	13.6	55.3	31.1	23,819
Avg. income in applicant's zip code				
Below State median	11.8	53.1	35.0	193,599
Above State median	9.7	52.4	37.9	177,052
Gross household income as percentage of the federal poverty level				
0	3.6	48.3	48.1	133,256
1-25	3.3	55.9	40.8	32,577
26-50	9.5	58.7	31.7	44,163
51-75	32.1	40.6	27.4	55,854
76-100	16.6	56.3	27.1	36,997
101-130	11.5	62.5	26.0	35,095
130+	6.7	65.1	28.2	34,061
Personal earned income				
Yes	3.1	62.7	34.1	68,737
No	12.6	50.5	37.0	304,028
Personal Social Security or SSI income				
Yes	67.5	16.4	16.1	29,576
No	6.0	55.9	38.2	343,189
Children (under age 18) in household				
Single adult	4.4	68.9	26.6	125,745
Multiple adult	4.2	64.1	31.7	65,305
No children in household				
Single adult	18.4	36.0	45.6	156,489
Multiple adult	14.0	44.5	41.5	23,270
Homeless				
Yes	8.7	49.7	41.6	22,995
No	11.0	52.9	36.1	349,770
Coded with a disability				
Yes	49.2	23.0	27.8	70,877
No	1.8	59.7	38.5	301,888
Gender				
Female	9.5	57.6	32.9	231,231
Male	13.0	44.8	42.2	141,429
Age				
16 to 30	5.2	57.0	37.9	143,970
31 to 45	9.6	55.5	34.9	145,096
46 to 59	22.7	40.6	36.6	83,699

Race	Percentage of individuals ages 16 to 59 determined not subject to work requirements because of a physical/mental limitation ^a	Percentage of individuals ages 16 to 59 determined not subject to work requirements for other reasons	Percentage of individuals ages 16 to 59 determined subject to work requirements	Number of individuals ages 16 to 59
White	12.4	52.3	35.2	117,476
Black/African American	11.0	54.7	34.3	220,623
Other	6.6	58.2	35.2	16,494
Missing/unknown	2.9	26.4	70.7	18,172
Total N	40,425	196,540	135,800	372,765

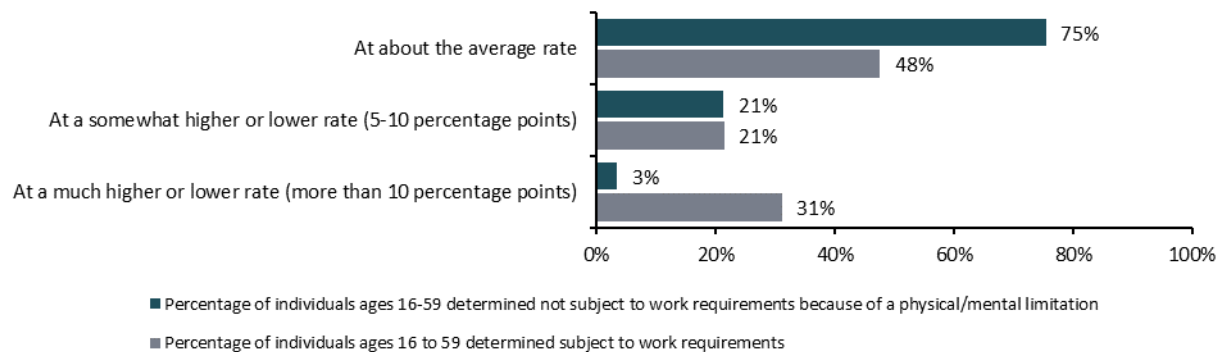
Source: Mathematica analyses of Maryland administrative SNAP data (August 2023-October 2023)

Note: Except for race, missing data range from 0 to 0.6 percent. Some row percentages sum to more than 100 due to rounding.

^a Includes individuals exempt due to pregnancy.

County and SNAP office making the determination. In total, 101 SNAP offices made determinations across Maryland’s 23 counties, the State DHS office, and the city of Baltimore in Maryland’s administrative data system.³⁸ No counties appeared to be outliers in the rates at which they made determinations around work requirements (appendix table D.2i). About one-third of offices determined individuals to be subject to the work requirements at application at much higher or lower rates (more than 10 percentage points) than the State average (see figure 4.4). Much less variation existed in the rate at which offices determined individuals as not subject to the work requirements because of a physical or mental limitation.

Figure 4.4. Determinations at Application, by Local SNAP Office



N = 61 local SNAP offices with at least 20 determinations for the 372,765 applicants in the study sample.

Source: Mathematica analyses of Maryland administrative SNAP data (August 2023-October 2023)

Note: Average rate for determined subject to work requirements is 36.4 percent; average rate for coded as having a physical/mental limitation is 10.8 percent.

4.B.3 Differences in Determination Patterns at Application and Recertification

Patterns in determinations at recertification mirrored patterns at application with the following notable exceptions or ways in which application patterns became more pronounced. Supplemental tables for recertification data are in Appendix D.2.

- Participants who had personal income from Social Security or SSI were excused because of physical or mental limitations at a higher rate than at application, and a much smaller percentage were subject to work requirements at recertification than at application.

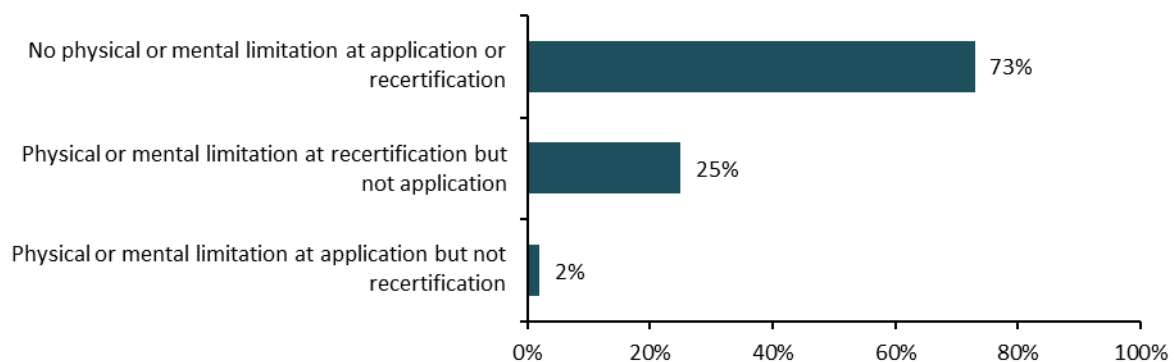
³⁸ To identify differences in determinations among offices, we excluded from the analysis offices that had made fewer than 20 determinations each.

- Participants who were homeless were three times less likely to be determined subject to the work requirements at recertification than at application.
- By recertification, almost no participants coded as having a disability were determined subject to work requirements.
- At recertification, five counties had work requirements determination rates that diverged from the others. In Baltimore City, Harford County, Montgomery County, Wicomico County, and Worcester County, participants were determined subject to work requirements at much lower rates than in other counties. Determinations about unfitness for work due to physical or mental limitations, however, remained broadly consistent across counties.

4.B.4 Changes in Determinations Over Time

Maryland was unique among the case study States in that the individuals ages 16-59 included in the analysis of recertification determinations was a subset of those included in the analysis of application determinations, enabling an assessment of changes in determinations over time. Only ten percent were subject to work requirements at both application and recertification (appendix table D.2m.). Among those determined not subject to the requirements at one or both times, almost two-thirds (62 percent) were not subject to requirements at both times for the same reason each time. Of those whose determination or reason for not being subject to work requirements changed, typically a physical or mental limitation was not the reason for the change. While some (just over 10,000 people) were determined not subject to requirements because of a physical or mental limitation at recertification when they did not have this determination at application, rarely did a determination of unfitness because of a physical or mental limitation at application change by recertification (figure 4.5).

Figure 4.5. Changes in Determinations Over Time, Among Those With Changes



N = 126,043

Source: Mathematica analyses of Maryland administrative SNAP data (August 2023-October 2023)

Note: 246,722 of all individuals ages 16-59 were excluded from this analysis because they had not been on SNAP long enough to have had a first recertification. Physical or mental limitations include pregnancy.

4.C. Good Cause Determinations

Maryland’s SNAP policy manual indicated that eligibility workers made good cause determinations when temporarily excusing participants from work requirements for individuals deemed non-exempt from those requirements. This would include circumstances beyond a participant’s control, including mental or physical limitations such as illness, household emergency, and chronic homelessness that renders a participant unfit for work.

State staff reported utilizing similar communication strategies, including action transmittals and informational memos, to inform local staff about information related to good cause determinations as they did exemptions and exceptions. Similarly, while there was not a training exclusively focused on good cause determinations, topics related to making good cause determinations may be covered in quarterly “Connect the Dots” trainings or refresher trainings.

4.C.1 Process for Making Good Cause Determinations

Eligibility workers used good cause determinations when someone was not fulfilling work requirements; reasons for not participating must be narrated in E&E. Usually, good cause determinations related to mental or physical limitations were only allowed for short-term situations. One eligibility worker said they provided good cause in 30-day increments; once the 30 days was over, an eligibility worker would reevaluate the case and determine if the individual should receive an exemption or exception from work requirements because it has turned into a longer-term mental or physical limitation. Similar to the process for making exemptions and exceptions, eligibility workers required verification if the disability was unclear. Staff at the urban site reported that participants were always required to provide verification from a medical provider for good cause determinations due to mental or physical limitations.

4.D. Challenges and Key Takeaways

DHS and LDSS staff highlighted complex and evolving policies, staff turnover, and separate data systems as challenges they faced while making determinations. Interviews with staff also revealed a desire for a more standardized process for making determinations based on physical and mental limitations and confusion around good cause requirements.

4.D.1 Challenges

Complex and evolving policies cause confusion. Staff reported that policies around work requirements, exemptions, and exceptions are complex and changed frequently, which made them challenging to implement quickly and efficiently. While local staff reported that action transmittals were a useful way to communicate policies, the frequency with which policies change resulted in DHS sending out many action transmittals. One eligibility worker also said there were sometimes delays in receiving these memos. In addition, eligibility workers expressed that these constant policy changes were difficult to communicate to participants.

“One small change may not seem very big, but then we need to issue action transmittals, and make systems changes to ensure that the system is working properly, and then we need to check if the notice is going out and determine when changes should occur to systems.”

–State staff

Staff turnover. State staff noted that staffing turnover and shortages were an issue for the program, especially during the COVID-19 pandemic. New staff did not have as much knowledge about the work requirements, exemptions, and exceptions. In addition, many counties have not completed ABAWD screenings since the onset of the COVID-19 pandemic due to the ABAWD time limit waiver.

Separate data systems cause delays. The two data systems, E&E and WORKS, were supposed to share data related to exemptions and exceptions through an interface. However, both State and local staff reported that this did not always happen in a timely manner. One eligibility worker noted that it

may be helpful to have just one system to reduce discrepancies and eliminate having to manually enter data multiple times.

4.D.2 Key Takeaways

Staff desire more standardized processes. Staff at both urban and local sites expressed that they would like a more standardized and straightforward process for making fitness for work determinations because of physical or mental limitations. Staff recognized that they were not medical professionals and believed they should not be required to make medical determinations. One staff noted that requiring the medical form may be a useful way of avoiding making medical decisions. Another interviewee said that exemptions and exceptions should be more integrated into the E&E system to ensure consistency. For example, there should be a specific set of questions eligibility workers must ask to assess if an individual experiences a barrier to working (e.g., problems with mobility).

Confusion around good cause determinations. Local sites varied in their understanding of good cause determinations. Eligibility workers at one site used the phrases “good cause determination” and “exemptions and exceptions” interchangeably. They noted that there was significant overlap between what would be considered a good cause determination and what would be considered an exemption or exception. In both cases, verification would be required. Eligibility workers at the other site specified that they would only issue a good cause determination for temporary situations (e.g., twisted ankle).

Importance of limiting burden on applicants and participants. Staff highlighted the importance of accurately determining applicants and participant’s physical and mental limitations, while not overburdening them. Utilizing Government Data Hubs to verify temporary or permanent disability benefits was one way to limit burden. Eligibility workers at the rural office also reported reaching out to participant’s representatives at local mental health organizations that serve low-income clients to verify a mental limitation rather than requiring the applicant or participant to complete the medical form. While this reduced burden on individuals, it may have been most applicable for eligibility workers with smaller caseloads who could give more time to each applicant.

“It’s important that when we’re talking with customers, we’re not too invasive and put too much of a burden on them to prove these things. Because it’s not my business what these mental or physical limitations are, it just matters if they have them.”
—Eligibility worker

Using a task-based approach. Local staff at one site noted that using a task-based approach to processing applications and recertifications allowed them to become experts in one piece of the process, rather than having to learn details about the entire cycle of a case. This may have helped staff learn and apply complex policies that continued to evolve.

5 Texas Case Study

The Texas Health and Human Services Commission (HHSC) agency administered the State’s SNAP program. HHSC used a statewide caseload processing model that helps ensure staff implement policies related to exemptions, exceptions, and good cause and that policies are applied consistently across the State. Eligibility workers had little flexibility in making determinations and relied on information from the application and verification (e.g., physician’s statement) to determine if applicants should receive an exemption or exception due to physical or mental limitations. Good cause determinations were made when individuals were not complying with work requirements; typically, E&T providers will communicate if an individual has a good cause claim to HHSC, which will then make the final good cause determination.

This chapter provides an overview of Texas’ policies and processes surrounding fitness for work determinations and good cause determinations at the time of the site visit in December 2023, and trends in fitness for work determinations based on individuals ages 16-59 in households that received a SNAP benefit in any month between August 2023 and October 2023.

5.A. Fitness for Work Determinations

Texas’ policies and guidelines on fitness for work determinations came from federal guidance. Texas did not have any State-specific exemptions or exceptions. State staff noted that they only make changes if there is a change in federal policy or if clarification was needed.

5.A.1 Defining Fitness for Work Determinations

The Texas’ policy manual (called the Texas Works Handbook) outlined what would qualify as physically or mentally unfit. Table 5.1 details the exemption and exception criteria for being physically or mentally unfit as described in the Texas Works Handbook.

Table 5.1. Texas Exemption and Exception Criteria for being Physically or Mentally Unfit

Criteria	Exemption from General Work Requirements	Exception from ABAWD Work Requirements
Have an obvious disability	◆	◆
Receive temporary or permanent disability payments	◆	◆
Provide verification (Form H1836-A Medical Release/Physician’s Statement)	◆	◆
Apply for SSI and SNAP at the Social Security Administration (SSA) office and await an SSA eligibility determination.	◆	

Source: Texas Works Handbook

In addition, Texas had some specific exemptions from SNAP E&T participation. Texas was a mandatory E&T State and therefore applied a minimum or full-service SNAP E&T designation to each county. There were 52 minimum-service where any SNAP recipient (mandatory or exempt) could volunteer to participate in SNAP E&T services and individuals who voluntarily participated could not be sanctioned for failure to cooperate. Participants who resided in the remaining 202 full-service counties across Texas were required to participate in SNAP E&T unless they received an exemptions or exception. Counties were determined to be minimum- or full-service based on the unemployment rate and resources available in the area. According to Texas’ SNAP E&T State Plan,

participants that lived in minimum-service counties and participants that were 50 years old as of September 1, 2023, and 50 to 51 years old as of October 1, 2023 were granted a discretionary exemption from mandatory SNAP E&T participation. However, all exempt and non-exempt work registrants were referred to the SNAP E&T program. Exempt work registrants could voluntarily participate in the SNAP E&T program but were not sanctioned if they did not comply with the requirements of the program.

5.A.2 Communicating Policies and Guidance for Making Fitness for Work Determinations

HHSC provided policy and guidance through their Texas Works Handbook, which detailed the policies on exemptions and exceptions due to physical or mental limitations. When policies and procedures changed, State staff updated local staff through bulletins or workforce development letters. HHSC policy staff drafted bulletins detailing policy changes, which the Commissioner then reviewed prior to publication. In recent years, HHSC issued several bulletins related to COVID-19, including bulletins on ABAWD time limits, suspending E&T services, and resetting ABAWD countable months. HHSC staff also received job aids, which were documents that guided staff step-by-step on how to process applications, included helpful links, and were saved in a repository for all staff. Emails to HHSC staff communicated policy changes and reminders.

HHSC was the administrator of the SNAP E&T program and partnered with the Texas Workforce Commission (TWC) to operate the program. TWC detailed the policies for not meeting E&T participation requirements in the SNAP E&T guide. TWC also published workforce development letters whenever they got directives from HHSC and distributed letters to the 28 workforce development boards they worked with.³⁹

In addition to written resources, HHSC and TWC staff communicated policies and guidance through team meetings. HHSC State staff and local staff reported hosting monthly staff huddles where supervisors met with all the units in a local office and walked through policy changes. A local HHSC staff member also mentioned staff meetings where every unit in a region could discuss changes and reminders. TWC workforce development boards held interagency meetings that allowed them to compare their policies with other workforce development boards' policies.

Trainings

Staff reported receiving general training on SNAP and SNAP E&T policies. While staff did not receive any specific training on granting exemptions or exceptions due to physical or mental limitations, the training they received may include scenarios or examples of when eligibility workers should grant exemptions or exceptions.

HHSC offered new eligibility worker training after orientation and covered all aspects of SNAP and SNAP E&T. The annual refresher training was online and required for State staff and supervisors, such as eligibility workers, supervisors, program managers, and regional directors. The annual refresher training covered various topics, including E&T and ABAWD policies. One of the scenarios was about granting exemptions due to physical or mental limitations. In addition to these

³⁹ TWC works with 28 workforce development boards that are composed of elected leaders who provide planning and oversight for workforce development programs. The workforce development boards oversee a certain number of counties, and they contract with local workforce solution offices, councils of governments, and other organizations across the State to provide SNAP E&T services. Contractors may also have subcontractors (e.g., Goodwill Industries could be a subcontractor of a Workforce Solutions Center).

regular trainings, the Office of Leadership and Professional Development within HHSC would conduct ad hoc trainings if certain topics were raising questions among eligibility workers.

TWC staff also described providing training at multiple levels to clarify policies, respond to questions, and pass down directives from HHSC. TWC had a technical assistance team that typically provided trainings to workforce development boards, contractors, or the quality assurance network at least once a quarter or on an ad hoc basis. The technical assistance team conducted customized trainings, including preparing PowerPoints, YouTube videos, webinars, and Q&A sessions. TWC also hosted monthly workforce meetings where staff raised policy issues and sought clarification. Workforce development boards trained their contractors on policies passed down from TWC or HHSC on the SNAP E&T program. Lastly, an E&T provider mentioned having biweekly roundtables where the E&T provider trained the E&T case managers on specific participant situations.

5.A.3 Process for Making Fitness for Work Determinations

Under the statewide caseload processing system, eligibility workers processed SNAP applications from anywhere in the State using a global queue. If an application needed more information or verification of a disability, eligibility workers “pended” the application and sent it back to the global queue, and another eligibility worker would finish processing the application when the SNAP applicant submitted the information or verification documents.

Staff also reported that the process to screen ABAWDs for fitness for work determinations was the same as general work registrants.

Making determinations at initial application

Application. Applicants completed applications online at YourTexasBenefits.com, in person at a local office, or over the phone. The application asked applicants to indicate whether they have a disability or not, but it did not ask specific questions about the disability (e.g., diagnosis). If applying over the phone or in person, eligibility workers entered the application information into the Texas Integrated Eligibility Redesign System (TIERS) as they processed the application. TIERS included a disability screen where eligibility workers noted whether the disability was mental or physical, the beginning date of disability, and the review date.

Interview. At the time of the site visit, Texas did not require eligibility interviews, but some eligibility workers were nonetheless conducting them.⁴⁰ Eligibility workers at the rural site did not conduct interviews unless they had questions or needed to clear up a discrepancy. Otherwise, the rural eligibility workers sent letters to applicants detailing what information was needed to process their application. Eligibility workers at the urban site noted that they try to contact applicants to conduct interviews to determine eligibility. If applicants left the question about having a disability on the application blank, eligibility workers may have followed up with additional questions. Applicants could complete interviews in person or over the phone. The process for screening for exemptions or exceptions did not differ if applicants had a phone or in person interview.

Verification. Eligibility workers used the SSA interface to verify when applicants received SSI. Applicants who did not receive SSI were required to provide verification of a physical or mental limitation using the “H1836A, Medical Release/Physician’s Statement” form. The form required a

⁴⁰ Texas was approved to waive the interview requirements for initial application and recertification until Spring 2024.

medical professional to indicate how long a disability would last, with a maximum of 12 months, and the extent to which the individual was able to work or participate in activities to prepare for work. Applicants also had the option to get a physician’s statement indicating how long the disability would last. Eligibility workers could verify an obvious physical or mental limitation without additional documentation. However, eligibility workers who had not been completing interviews had primarily been relying on medical forms or physician’s statements for verification since they were unable to determine if a limitation was considered obvious.

TIERS required eligibility workers to document how they verified a physical or mental limitation. If a physical or mental limitation was obvious, eligibility workers selected “visual observation” in TIERS as the type of verification provided. When applicants submitted a medical verification form, eligibility workers manually entered the information into TIERS.

When applicants did not have access to medical providers to get the medical form filled out, eligibility workers referred applicants to medical care. State staff mentioned that eligibility workers referred applicants to medical professionals via the 211 system, which is a free statewide information and referral service. Eligibility workers at the urban site also noted that they connected applicants to local mental health resource programs.

Determination. The TIERS system automatically made the exemption or exception determination based on information eligibility workers entered from the application or interview. Eligibility workers noted they had little flexibility since they typically relied on information provided by the medical provider to determine if someone should receive an exemption or exception. However, State staff noted that an obvious disability could be at an eligibility worker’s discretion.

Eligibility workers did not need to receive approval for an exemption or exception determination. An eligibility worker might reach out to their supervisor or lead workers for support on a decision, or a case decision might change if it was re-read during quality control case readings.

Making determinations at recertification

The process for receiving an exemption or exception from work requirements at recertification was similar to the process at application. Participants completed recertification at six or 12 months depending on the applicant. For example, a single person household would have a 12-month recertification period while a household with young children would have a six-month recertification period. Participants fill out a simplified recertification form that had some basic information prepopulated. In addition to the simplified form, participants needed to submit another medical verification form depending on the timeframe of the disability included in the original medical form. If the participant received an exemption or exception because they received disability benefits, eligibility workers would verify at recertification that they continued to receive those benefits using the SSA interface.

“I have very little flexibility. They should be following up with a physician or someone if they are struggling with a physical or mental disability. There should be some medical care happening for the individual.”

—Eligibility Workers

Making determinations at other times

Participants would disclose a physical or mental limitation when starting E&T services. E&T providers got referrals from HHSC through a weekly outreach pool, which is a list of individuals

who needed to be contacted to participate in E&T services. E&T providers received this information in The Workforce Information System of Texas (TWIST).⁴¹ During a participant’s orientation meeting, E&T providers explained the allowable exemptions or exceptions with the participant. At that point, the participant would declare a physical or mental limitation or another exemption or exception before they started participating in E&T services. E&T providers did not make provider determinations in Texas. If a participant reported a physical or mental limitation, E&T providers filled out the “H1817, SNAP Information Transmittal Form” to let HHSC know that the participant reported a potential exemption or exception; the H1817 form indicated that eligibility workers needed to re-evaluate the participant’s work requirements. E&T providers also gave participants the H1836A medical form for their physician to fill out and return to their HHSC eligibility worker.

5.A.4 Appealing Fitness for Work Determinations

Applicants or participants had the right to appeal if they had been denied an exemption or exception from work requirements due to a physical or mental limitation. The notice an applicant or participant received regarding their determination explained the appeal process. Individuals could start the appeal process by calling a toll-free number, going online, or visiting a local office. State and local staff noted that HHSC staff could try to resolve the issue by having the applicant or participant talk with a supervisor before the applicant or participant filed the formal appeal. If an applicant or participant decided to continue with the appeal process, a separate department handled the appeal process, and eligibility workers were not involved.

5.B. Trends in Fitness for Work Determinations

This section presents findings from the administrative data analysis in Texas, which included all individuals ages 16-59 in households that received a SNAP benefit in any month between August 2023 and October 2023, excluding those in the Texas Simplified Application Project (TSAP) and the SNAP-Combined Application Project (SNAP-CAP).⁴² Application data were for individuals in households that had not been on SNAP long enough as of October 2023 to have gone through a first recertification for their current spell of participation; unlike in the other case study States, data reflect current circumstances (that is, as of the data collection period), rather than at the time of the application. Recertification data were for individuals in households that had been on SNAP long enough as of October 2023 to have gone through at least one recertification; as with the application sample, data reflected current circumstances (that is, as of the data collection period), rather than at the time of recertification. As in Georgia and Maryland, Texas’s eligibility and benefit determination system allowed eligibility workers to code only one reason why an individual were determined not subject to work requirements. Thus, the percentage of individuals determined not subject to work requirements because of a physical or mental limitation presented in this section might be lower than the actual percentage of individuals with physical or mental limitations in regular SNAP (that is, exclusive of TSAP and SNAP-CAP).

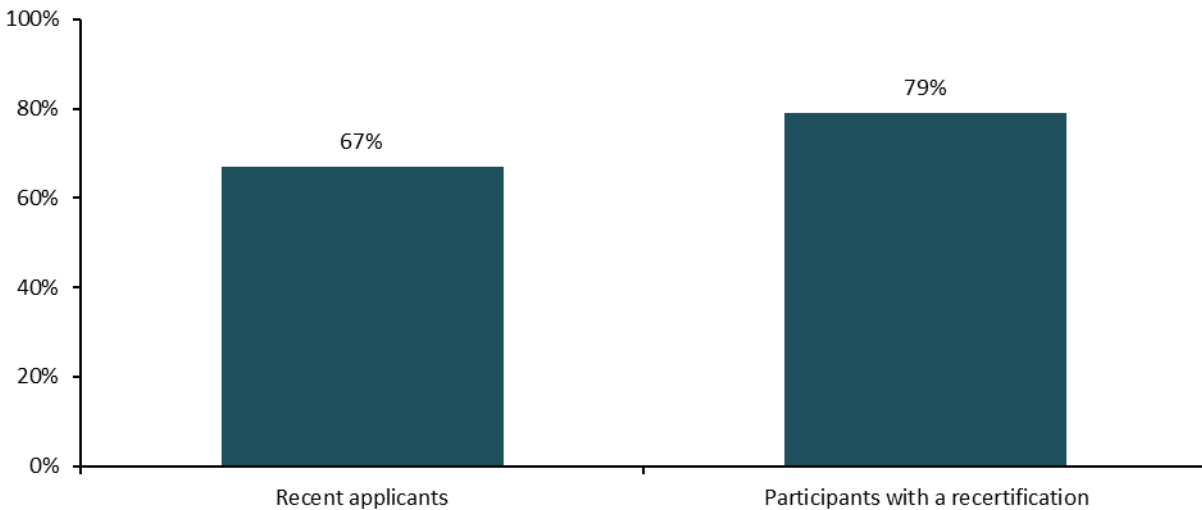
⁴¹ During the site visit, the study team was informed that Texas was in the process of replacing the TWIST data system with a new system.

⁴² Households in TSAP met all of the following criteria: (1) all the members were age 60 or older, received disability payments no matter their age, or were a combination of both; (2) no members earned income; and (3) no members received benefits under SNAP-CAP. Communication from the HHSC Office of Data Analytics and Performance suggested that roughly 144,000 people who were under age 60 (and, thus, received disability payments and, in turn, were exempted from general work requirements) were excluded from our analysis because they were on TSAP. People in SNAP-CAP met all of the following criteria: (1) received SSI; (2) were age 50 or older; (3) lived in Texas, not in an institution that caused ineligibility; and (4) did not receive a regular SNAP or TSAP benefit. Communication from the HHSC Office of Data Analytics and Performance suggested that roughly 11,000 people were excluded from our analysis because they were on SNAP-CAP (and thus, exempted from general work requirements).

5.B.1 Determinations at Application and Recertification

About two-thirds (67 percent) of recent applicants ages 16-59 were currently determined not subject to work requirements (see figure 5.1).⁴³ The proportion increased to almost four-fifths (79 percent) for participants with a recertification. Texas did not provide data for SNAP household members younger than 16, so the study team was unable to conduct analyses for ABAWDs, as the definition for ABAWDs relies on presence of children in the household.

Figure 5.1. Current determination: not subject to work requirements among all individuals ages 16-59

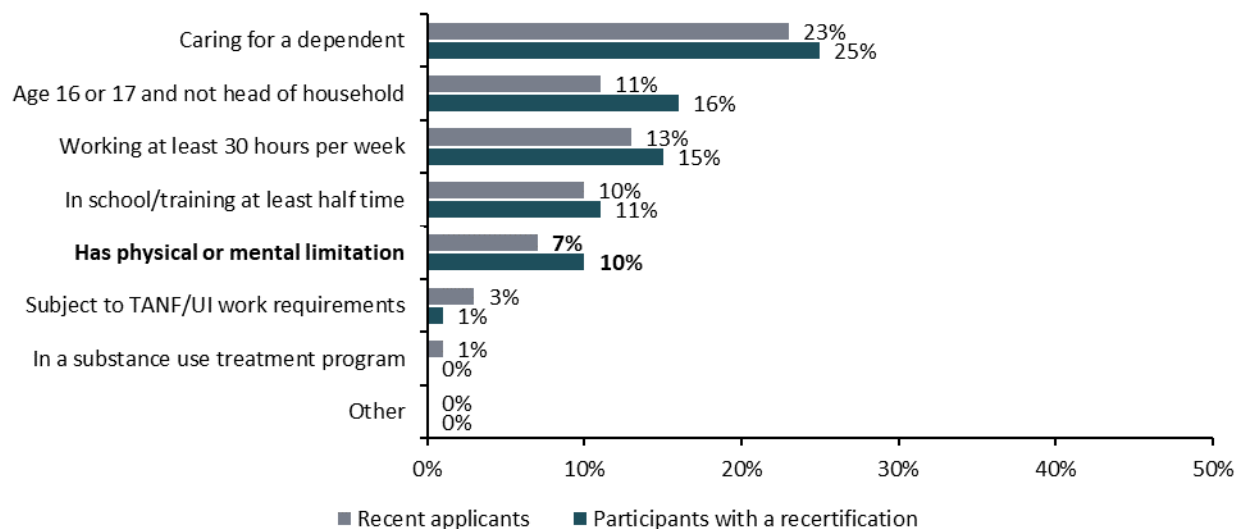


Application N = 828,289; Recertification N = 537,782
Source: Mathematica analyses of Texas administrative SNAP data (August 2023-October 2023)

The presence of a physical or mental limitation was among the least common reasons why recent applicants were determined not subject to work requirements (see figure 5.2). The most prevalent reason was caring for a child under age 6 or an incapacitated person, followed by employment, age (16 or 17 and not the household head), and student status. Only seven percent were exempt because of a physical or mental limitation. A similar pattern existed for participants with a recertification.

⁴³ Unlike in Georgia and Wisconsin where the number of recertifications is higher than the number of applications, the number of applications is higher than the number of recertifications in Texas. Several potential explanations exist. First, the HHSC Office of Data Analytics and Performance reports a cyclical increase in applications in the fall triggered by the start of the new school year and the upcoming holiday season. Second, the data collection period (August – October 2023) was at the height of the COVID-19 PHE unwinding efforts, requiring eligibility workers (who process cases for SNAP as well as Medicaid, CHIP and TANF) to initiate over two million recertifications in that timeframe for individuals with extended Medicaid coverage. Eligibility staff shifted their work priorities daily to handle the workload, which may have resulted in some SNAP recertifications processed as untimely recertifications (i.e., new applications) with benefits issued retroactively.

Figure 5.2. Reasons for Being Determined Not Subject to Work Requirements



Application N = 828,289; Recertification N = 537,782
 Source: Mathematica analyses of Texas administrative SNAP data (August 2023-October 2023)

5.B.2 Patterns in Determinations at Application

Key findings from an analysis of patterns in fitness for work determinations included the following (see table 5.2). Texas did not provide data for SNAP household members younger than 16, so we were unable to conduct analyses by household characteristics. Additional information and supplemental tables on patterns at application and recertification can be found in Appendix D.

Community characteristics. Patterns in fitness for work determinations did not vary by the characteristics of the communities in which SNAP applicants lived (specifically, their urbanicity, employment rate, and average income).

Income. As would be expected given the definition of unfit for work, applicants with personal earned income were rarely determined unfit for work because of a physical or mental limitation (two percent). Conversely and, also as would be expected, most individuals receiving disability benefits through SSI (69 percent) were determined unfit because of a physical or mental limitation. Almost all other SSI recipients were exempt from work requirements because of other reasons (only one percent were determined subject to work requirements).

Homelessness. Three-quarters of applicants who were homeless were subject to work requirements.⁴⁴ Eight percent of the small number of applicants coded as homeless in the eligibility and benefit determination system were determined unfit for work because of a physical or mental limitation—a similar rate as those who were not homeless.

Other demographic characteristics. Males were much more likely than females to be subject to work requirements, but the lower rate among females was due to reasons other than physical or mental limitations. In addition, applicants on the older end of the 16-59 age range (46- to 59-year-olds) were much more likely than those on the younger end to be subject to work requirements, but

⁴⁴ About three percent of recent applicants ages 16-59 (22,882 of 828,289) are coded in Texas’s data system as homeless. Most applications in the analysis were processed before enactment of the 2023 Fiscal Responsibility Act, which amended the 2008 Act to excuse individuals experiencing homelessness from the ABAWD work requirement and time limit. As noted above, we did not analyze data for ABAWDs.

among those exempt, older applicants were more likely to be exempt because of physical or mental limitations than younger applicants. These results may be driven by a relatively higher percentage of females and younger applicants caring for a child under 6 or an incapacitated person. The percentage of missing data was too high to meaningfully interpret patterns in determinations by race or marital status (23 percent and 24 percent, respectively). Applicants of Hispanic or Latino origin were subject to work requirements and determined unfit because of a physical or mental limitation at similar rates as others.

Table 5.2. Determinations for Applicants, by Applicant Characteristics

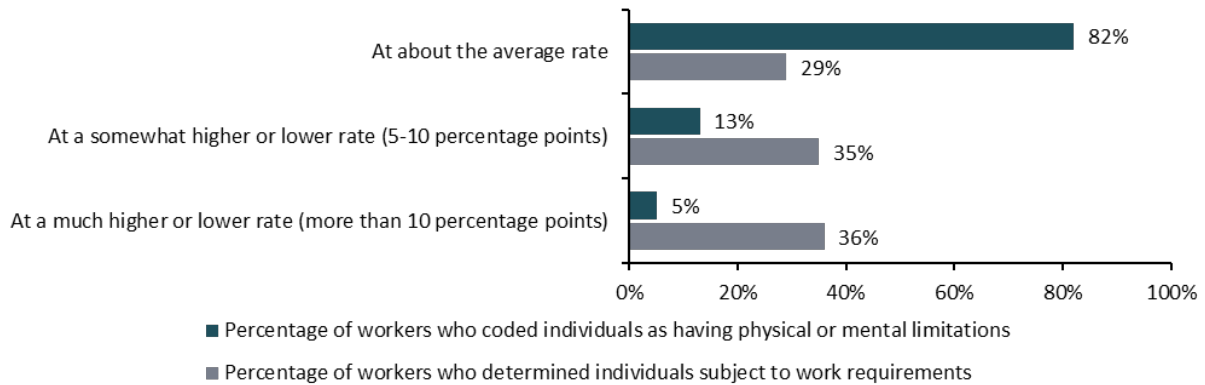
	Percentage of individuals ages 16 to 59 determined not subject to work requirements because of a physical/mental limitation	Percentage of individuals ages 16 to 59 determined not subject to work requirements for other reasons	Percentage of individuals ages 16 to 59 determined subject to work requirements	Number of individuals ages 16 to 59
Urbanicity of applicant's zip code				
Metropolitan	6.4	60.3	33.2	723,440
Micropolitan	7.9	61.4	30.7	65,654
Rural	8.4	59.0	32.6	39,028
Unemployment in applicant's zip code				
Less than 10%	6.7	60.6	32.7	760,359
10% or greater	7.1	58.3	34.5	64,591
Avg. income in applicant's zip code				
Below State median	7.0	60.1	32.9	394,842
Above State median	6.4	60.7	32.9	428,841
Personal earned income				
Yes	2.4	84.5	13.1	244,526
No	8.6	50.2	41.3	583,763
Personal SSI income				
Yes	69.2	29.4	1.4	23,776
No	4.9	61.2	33.9	804,513
Homeless				
Yes	8.1	17.8	74.1	22,882
No	6.7	61.5	31.8	805,407
Gender				
Female	5.7	66.2	28.1	551,586
Male	8.8	48.5	42.7	276,425
Age				
16 to 30	3.0	76.9	20.1	391,612
31 to 45	7.0	53.6	39.4	301,607
46 to 59	17.0	27.1	55.9	135,070
Ethnicity				
Hispanic or Latino	5.2	65.4	29.5	389,913
Not Hispanic/Latino	8.0	56.7	35.4	403,945
Missing/unknown	10.0	46.0	44.0	34,431
Total N	55,724	499,556	273,009	828,289

Source: Mathematica analyses of Texas administrative SNAP data (August 2023-October 2023)

Note: Some row percentages sum to more than 100 due to rounding.

Eligibility worker. Variability existed in the determination decisions eligibility workers made. Of 5,684 workers, about 29 percent determined applicants as subject to work requirements at about the average State rate of 33 percent (see figure 5.3).⁴⁵ Almost half determined applicants as subject to work requirements at a much higher or lower rate (by more than 10 percentage points) than average. Much more consistency among eligibility workers exists in exemptions because of physical or mental limitations, though the result may be driven by the low average rate of exemptions for this reason.

Figure 5.3. Determinations at application, by eligibility worker



N = 5,684

Source: Mathematica analyses of Texas administrative SNAP data (August 2023-October 2023)

Note: Average rate for determined subject to work requirements is 33 percent; average rate for coded as having a physical/mental limitation is 6.7 percent.

5.B.3 Differences in Determination Patterns at Application and Recertification

Patterns in determinations at recertification mirrored patterns at application with the following notable exceptions or ways in which patterns among recent applicants become more pronounced. Appendix D provides supplemental tables.

- Differences by gender observed among recent applicants dissipated among participants with a recertification. Between one-quarter and one-fifth of male and female participants with a recertification were subject to work requirements.
- A much lower percentage of individuals who were homeless were subject to work requirements in the recertification sample than in the application sample. As opposed to recent applicants, participants with a recertification were more likely to be exempt because of a physical or mental limitation if they were homeless than if they were not homeless.

5.C. Good Cause Determinations

According to State staff, policies on good cause should be followed uniformly across the TWC workforce development boards and contractors. E&T providers would inform HHSC if a participant claimed they had good cause for not participating in work requirements. While TWC shared information, HHSC was the entity that ultimately determined whether a good cause determination is granted.

⁴⁵ In total, 8,735 different eligibility workers made at least one determination for the applicants in this analysis. To identify differences in determinations among them we excluded workers who had made fewer than 20 determinations each.

5.C.1 Current Policies for Good Cause Determinations

According to the Texas Works Handbook, HHSC eligibility workers made good cause determinations related to physical or mental limitations when a participant was noncompliant with the E&T program due to an “illness of the person or another household member” or the “household member is physically or mentally unfit for the job.” Eligibility workers also made good cause determinations when participants lacked transportation.

“As an E&T staff, we don’t determine good cause; that’s only HHSC... [It’s] always better to err on the side of caution. If a customer thinks they have a reason, [TWC staff] are supposed to notify HHSC and let them be the final decider.”

– TWC Staff

HHSC provided policy and guidance on good cause determinations due to physical or mental limitations through the Texas Works Handbook, and TWC outlined its good cause procedures in the SNAP E&T guide. When policy updates on good cause happened, TWC communicated these updates to the workforce development boards by reaching out to the main contact there and following up with a one-on-one meeting. Workforce development boards shared the updates with their contractors. TWC also used existing channels to pass down the policy updates, such as the aforementioned workforce development letters, Q&As, and monthly workforce meetings.

Similar to policies on exemptions, staff did not report any specific training on good cause determinations due to physical or mental limitations. TWC produced YouTube videos on good cause policies and penalties. As previously noted, TWC provided technical assistance to workforce development boards and contractors and responded to questions on claiming good cause. The most common question the technical assistance team received was how many times a participant could claim good cause; the answer was that there is no limit.

5.C.2 Process for Making Good Cause Determinations

Participants only received a good cause determination if they were noncompliant with E&T requirements (e.g., nonresponsive to TWC staff outreach).⁴⁶ E&T providers informed HHSC about the noncompliance electronically by initiating a sanction request through the TWIST system and sending the H1816 SNAP E&T Noncompliance Report Form. The TWIST system automatically interfaced with TIERS overnight. TIERS then generated and sent the participant the H1818 Agreement to Follow SNAP Work Rules form which provided instructions for claiming good cause and notified the participant that they had 10 days to claim good cause by contacting either TWC or HHSC.

Participants could also respond to TWC outreach and report a reason for good cause before getting the sanction request. If participants reached out to E&T providers and shared a reason for good cause, E&T providers communicated the claim electronically to HHSC through a drop-down menu in TWIST. If the drop-down menu did not include the reason for good cause and fell under “other,” E&T providers would send the H1816 Noncompliance Report Form to HHSC and specified the good cause claim. When participants had good cause for not complying with program requirements, they usually contacted E&T providers, although participants could also contact HHSC directly to claim good cause. Participants had four calendar days from the date of their missed outreach appointment to share their good cause claim with the E&T provider before a sanction was initiated.

⁴⁶ ABAWDs and general work registrants living in minimum-service counties were not sanctioned for noncompliance with E&T requirements.

TWC did not require verification from participants to recommend good cause to HHSC; they took what the participant reported at face value. However, HHSC typically required verification to make a good cause determination, just as they did for exemption or exceptions. HHSC would explore the reason for good cause and request verification of a physical or mental limitation using the medical form or a physician's statement if the disability was not obvious. The participant was responsible for submitting verification documentation, if needed, to their eligibility worker to receive good cause. If an HHSC eligibility worker granted the participant a good cause determination, HHSC communicated this back to E&T providers through the TIERS system, which then interfaced with the TWIST system, and no sanction was imposed.

E&T providers and eligibility workers typically communicated via the interface but would also reach out via fax or phone. The E&T providers in the rural area shared that because their community is small, they could communicate directly with HHSC. For example, they may have called an eligibility worker directly to explain a good cause claim.

Good cause determinations lasted until the next recertification or until the date indicated on the medical verification. Good cause determinations could lead to an exemption or exception if the participant provided the necessary verification. State staff noted that if a medical condition lasted over six months and the participant provided verification, it could be an exemption or exception. The process for making a good cause determination was the same for those subject to the general and ABAWD work requirements.

5.D. Challenges and Key Takeaways

HHSC staff reported several challenges, including unclear policies and forms, data systems inefficiencies, and increased burden on staff due to incomplete applications. However, staff also noted that the overall process for making fitness for work determinations was straightforward and appreciated the collaborative relationship between HHSC and TWC.

5.D.1 Challenges

Unclear policies and forms. Staff highlighted some instances where policies on exemptions or exceptions due to physical or mental limitations needed clarification. State staff, for example, brought up the importance of being clear about the difference between being disabled versus being incapacitated, which was not included in their policy guidance; a participant may be disabled, but they may still be able to work. State staff also noted that the medical verification form should make it clear that medical providers only needed to check one box under the personal disability section to describe the individual's ability to work or participate in activities to prepare for work. Some medical providers checked multiple boxes, which can cause confusion.

In addition, local staff reported that it would be helpful to give staff as much advance notice when policies on exemptions or exceptions change so they could review and digest updated policies.

Applicants had difficulty obtaining verification. Eligibility workers faced challenges explaining the verification requirements to applicants. In some cases, applicants did not think they would need to get verification for mental or physical limitations to access SNAP benefits, which required eligibility workers to explain the verification requirements. In addition, even with support from the statewide information and referral service (i.e., 211 system), applicants still faced difficulties accessing medical providers who could fill out the medical verification form either because they did

not have access to a physician or medical insurance, or they may have had severe mental health challenges that created an extra barrier to completing the form.

Data system inefficiencies increased staff burden. State staff noted that a participant's work requirements may have changed in TIERS but was not retroactively changed in TWIST. TWC staff needed to check TIERS if a participant reported that their work requirement changed to see if they were exempt; they then needed to submit a form requesting the work requirement be changed in TWIST. The fact that the work requirement in TWIST did not update created inefficiencies and placed the burden on TWC staff or the participant to ensure the work requirement was correct.

Increased staff burden due to incomplete applications. While applicants had a right to file an application with only name, address, and signature, eligibility workers noted that applicants leaving the disability question blank created additional burdens for them.⁴⁷ When this happened, eligibility workers needed to follow-up with applicants. Eligibility workers shared that it would be helpful if applicants applying online did not have the option to skip the disability question.

5.D.2 Key Takeaways

Straightforward fitness for work determination process. Because most eligibility workers relied on medical professionals to confirm the presence and anticipated duration of a physical or mental limitation, they felt confident in their decisions regarding fitness for work determinations. One eligibility worker described the determination process as “pretty cut and dry.” Both the urban and rural eligibility workers shared that they did not think more flexibility would be helpful. They expressed that they were not medical professionals and therefore should not make determinations on whether a SNAP applicant or participant had a disability and could not work.

"We have to follow policy, so we don't have that much flexibility...I don't think we should have flexibility because it would open up the door for each individual worker to put their own interpretation... It is for the physicians and doctors to determine the disability."

– Eligibility Workers

The collaborative relationship between HHSC and TWC streamlined the process. Although some challenges remained, the collaboration between HHSC and TWC to provide E&T services was highlighted as a strength. State staff shared that both HHSC and TWC understand their separate roles in the good cause determination process, with TWC communicating potential good cause claims to HHSC and HHSC making the final determinations. TWC and HHSC also worked collaboratively to test changes to the TWIST and TIERS interface.

⁴⁷ 7 CFR Part 273.2(b)(1)(v)

6 Wisconsin Case Study

The Division of Medicaid Services within the State’s Department of Health Services (DHS) housed Wisconsin’s SNAP program, FoodShare. FoodShare was county-administered with groups of counties joining together to create 11 consortia, largely according to geographic proximity, across the State. Policies and processes related to fitness for work were generally applied uniformly across the State; however, staff noted inconsistencies in the application of exemptions and exceptions between different eligibility workers. Fitness for work determinations were based almost exclusively on information provided in the application; eligibility workers only requested verification for individuals not receiving disability who provided questionable information.

This chapter provides an overview of Wisconsin’s policies and processes surrounding fitness for work determinations and good cause determinations at the time of the site visit in December 2023, and trends in fitness for work determinations based on a sample of Wisconsin administrative data for individuals 16-59 in all households that received a SNAP benefit in any month between September through November 2023.

6.A. Fitness for Work Determinations

DHS determined policies primarily in response to federal statutes and regulations, as well as policy memos and other guidance from FNS. When the State had discretion to develop or operationalize their policies, State staff might have observed what other States did; they may also have contacted their FNS Regional Office with questions.

6.A.1 Defining Fitness for Work Determinations

State policies and guidelines were documented in a FoodShare policy handbook, which was updated three times a year. As specified in the FoodShare policy handbook, exceptions from the ABAWD work requirements due to fitness for work were somewhat more expansive than exemptions from the general work requirement (see table 6.1). However, no specific physical or mental conditions were identified in the policy handbook for either requirement.

Table 6.1. Wisconsin Exemption and Exception Criteria for being Physically or Mentally Unfit

Criteria	Exemption from General Work Requirements	Exception from ABAWD Work Requirements
Receiving temporary or permanent disability benefits from government or private source	◆	◆
Mentally or physically unable to work as determined by the Income Maintenance agency	◆	◆
Verified as unable to work by a statement from health care professional or social worker	◆	◆
Displaying mental instability, combativeness, or other mental health issues		◆

Source: Wisconsin FoodShare policy handbook

6.A.2 Communicating Policies and Guidance for Making Fitness for Work Determinations

The State had a robust process for providing regular guidance on policy including work requirements, exemptions, and exceptions. DHS sent operations memorandums to the consortia detailing policy changes that occurred between revisions to the FoodShare policy handbook. State staff also issued Cares Coordinator Notices (CCN) to clarify policies and respond to questions, as well as bulletins to share SNAP data system updates and processing instructions. Typically, the State shared CCNs with the staff from the State's E&T program, known as Food Share Employment and Training (FSET), and consortium leadership or local office leadership, who then determined how to disseminate to eligibility workers. Consortia or offices had permission to develop additional guidance documents of their own.

DHS also communicated with FSET and local office staff through regular meetings. The State held monthly meetings with each consortium to communicate new guidance, discuss upcoming policy changes, address questions, and obtain feedback on operations and potential challenges. DHS also held monthly meetings with representatives from each local office. The State held quarterly meetings with all FSET providers to share policy updates.

Trainings

The State mandated instruction on general and ABAWD work requirements and exemptions and exceptions in new worker training but not annual worker training. New eligibility worker training was held in a cohort-format over six to eight weeks. It included classroom sessions, handouts, and shadowing more experienced eligibility workers. Annual worker trainings were offered in online modules through a platform called Cornerstone. DHS required eligibility workers to complete 12 hours of training per year on topics such as equity and inclusion, cultural competency, security, and others identified by DHS. Eligibility workers could select additional training topics, including exemptions or exceptions and good cause determinations, to meet the remaining hours of the annual worker training requirement. DHS also developed as-needed micro-learnings (i.e., short self-paced videos on new policies) such as reinstatement of ABAWD work requirements. Micro-learnings were made available ahead of policy changes to train workers prior to implementation.

6.A.3 Process for Making Fitness for Work Determinations

Policies related to making exemptions and exceptions were generally applied uniformly across the State. However, there were some differences by counties due to geographic waivers in ABAWD time-limit extensions. Consortia could have also had different ways of operationalizing policies, including staffing structure, call center hours, and a process for making appeals.

The process for screening for exemptions for the general work requirements and exceptions for the ABAWD work requirements were the same.⁴⁸

Making determinations at initial application

Application. Eligibility workers made fitness for work determinations based almost exclusively on the information provided in the application unless that information was unclear. Applicants could

⁴⁸ The ABAWD time limits that Wisconsin fully suspended through the FFCRA were reinstated in July 2023, but the State used its discretionary exemptions so that ABAWD time limit clock did not begin until October 2023.

submit a FoodShare application in four ways: completing a form remotely online; mailing a paper form to the SNAP office; calling the SNAP office and providing application information over the phone, which eligibility workers enter into the State SNAP eligibility and benefit determination system, Care Worker Web (CWW); and going to a SNAP office to share application information in person, which eligibility workers enter into CWW. Eligibility workers noted that online and phone applications were most common.

CWW (and the online application that feeds into CWW) included skip logic based on prior responses. For example, applicants who were receiving disability benefits through the SSA who applied online or with the assistance of an eligibility worker would not have to answer questions about their mental or physical limitations since receiving disability benefits qualified the applicant for an exemption or exception.

Applicants who were not receiving disability benefits and were applying online, by phone, or in person were asked about all other potential exemptions or exceptions to work requirements that could apply based on their age. Asking about all exemptions and exceptions ensured that the applicant's work requirement status did not change once on the caseload if their situation changed and they met another criterion. For example, even if an applicant was caring for a child under 6, thus exempting them from the general work requirements, the application (or eligibility workers, if they apply by phone or in person) still asked about physical or mental limitations. Subsequently, if the applicant's child aged out of that exemption, SNAP staff would still know whether the applicant was exempt due to a physical or mental limitation (or other reason) and not erroneously subject them to work requirements.

The application displayed text summarizing the work requirements, exemptions, and exceptions at the end. Applicants reviewed this text if they applied online or on paper, and eligibility workers read it aloud to applicants who applied by phone or in person with support from an eligibility worker. Eligibility workers who read the text aloud asked one more time if the applicant felt they met any exemption or exception criteria. This final check was in place to ensure that applicants did not miss an exemption or exception for which they were eligible.

Interview. As of December 2023, eligibility workers were only required to complete interviews when a participant's identity needed to be verified or if their initial application or recertification contained missing or unclear information.⁴⁹ Eligibility workers indicated this was uncommon, and they typically did not need to contact applicants for additional information.

Verification. Applicants who were receiving temporary or permanent disability benefits from a government or private source could use those benefits as verification of mental or physical limitation. CWW automatically populated data from the SSA on receipt of disability benefits. CWW automatically granted an exemption from the general work requirements (and therefore an exception from the ABAWD work requirements) for applicants receiving disability benefits from the SSA.

As of August 2023, verification of a physical or mental limitation was no longer required to issue an exemption or exception for those not receiving disability benefits, except in cases that eligibility workers deemed unclear. Prior to this, eligibility workers were required to ask for verification from a medical professional. Eligibility workers used their discretion to determine whether a participant's claim to mental or physical unfitness was unclear. Eligibility workers mostly reported that they took participants at their word unless their responses to application questions were inconsistent—for example, if an applicant indicated they were unable to work because of a mental or physical

⁴⁹ Wisconsin was approved to waive the interview requirements for initial application and recertification until Spring 2024.

limitation but had extensive recent work history. In such cases, staff may have asked for additional details about the limitation or request verification.

Determinations. Eligibility workers made the final determination on exemptions and exceptions. Supervisors typically reviewed cases from newer eligibility workers for about six months to ensure they were complying with State policies. Additionally, supervisors reviewed a small number of random cases of all eligibility workers as quality assurance. Eligibility workers may also have elevated unclear cases to supervisors to get their guidance about granting exemptions or exceptions.

“We don’t ask for verification necessarily, we just take them at their word. When people give little information, we’ll ask follow-ups. But most people will give you a whole autobiography. They tend not to hide a disability. Most people are truthful, I rarely feel like they’re lying.”

– Eligibility worker

Making determinations at recertification

FoodShare participants were reassessed for work requirement exemptions and exceptions during the recertification process. Most participants were required to complete recertifications annually. Households where all members were homeless or at least one member was a migrant or seasonal farm worker, however, must have completed a full recertification every six months. The process for making exemption and exception determinations during recertification was the same as for the initial application. Participants could complete recertification applications online remotely, on paper by mail, by phone, or in person. The questions in the recertification application were the same as in the initial application and the same regardless of whether the individual was subject to the general or ABAWD work requirements at the initial application. Information from the initial application or the most recent recertification was pre-filled in CWW, so participants simply confirmed it rather than entered it entirely anew.

Making determinations at other times

FSET provider staff may have found that a participant referred to them was unfit for work due to a physical or mental limitation.⁵⁰ FSET staff could not change the exemption or exception determination themselves. Rather, FSET staff told the participant they may be eligible for an exemption or exception and suggested they contact FoodShare eligibility workers to discuss a potential exemption or exception. FSET staff may have assisted the participant with that outreach. Similarly, participants were able to contact eligibility workers at any time between initial application and recertification if they were not granted an exemption or exception but think they may be eligible for one.

6.A.4 Appealing Fitness for Work Determinations

Participants could file for a fair hearing if DHS did not grant them an exemption or exception from work requirements. A judge from Wisconsin’s Department of Administration (DOA) oversaw and made the final determination on all appeals cases for all public benefits programs. However, staff noted that requests for appeals on work requirement determinations were not common. Staff in the rural county also reported an internal grievance process in which participants could submit a

⁵⁰ FSET is a voluntary E&T program. It is staffed and operated by external FSET contractors; there are no FSET caseworkers housed within the State FoodShare offices. Eight FSET providers operate across 11 regions within the State, though these regions are not coterminous with FoodShare consortia.

complaint, and a local administrator would review the case and possibly preserve or overturn the determination.

6.B. Trends in Fitness for Work Determinations

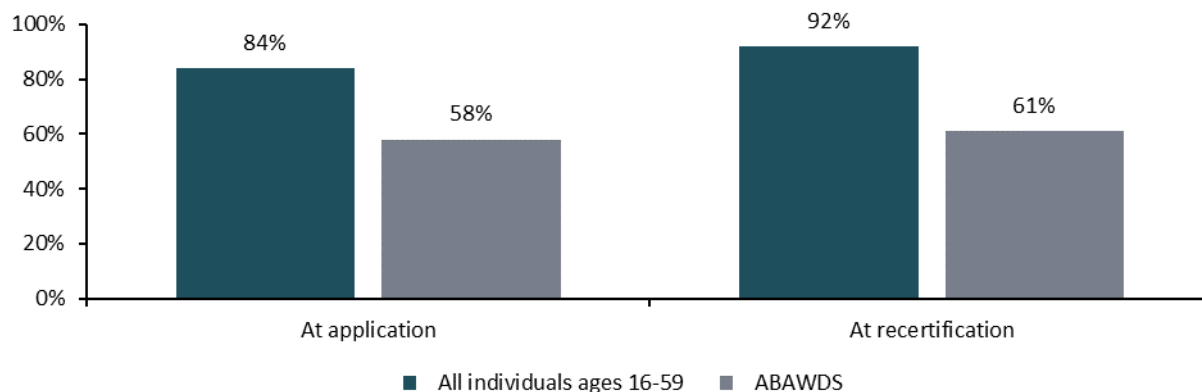
This section presents findings from the administrative data analysis in Wisconsin, which included all individuals ages 16-59 in all households that received a SNAP benefit in any month between September through November 2023. Application data are for individuals in households that had not been on SNAP long enough as of November 2023 to have gone through a first recertification for their current spell of participation; data reflect the application for the household's current spell on SNAP. Recertification data are for individuals in households that had been on SNAP long enough as of November 2023 to have gone through at least one recertification; data reflect the household's most recent recertification.

Wisconsin's eligibility and benefit determination system allowed eligibility workers to code multiple reasons why an individual may be determined not subject to work requirements. For instance, if an individual was the primary caretaker for a child under age 6 and has a physical or mental limitation, both exemption reasons may be coded in the data system. When multiple reasons existed, Wisconsin did not prioritize reasons or consider one "primary." As a result, the percentages of individuals determined not subject to work requirements because of specific reasons sum to more than the total percentage of individuals determined not subject to work requirements.

6.B.1 Determinations at Application and Recertification

Most individuals ages 16-59 (84 percent) were determined not subject to work requirements at application (figure 6.1). The percentage of individuals ages 16-59 determined not subject to work requirements was higher at recertification than at application, with almost 92 percent who received an exemption. About 28 percent of all applicants ages 16-59 (42,471 of 149,636) and 13 percent of participants with a recertification (30,848 of 231,796) met the definition of an ABAWD by virtue of their age, disability status, and presence of children in the household (appendix tables D.4a and D.4b). Over half of ABAWDs were not subject to the ABAWD time limit at application and recertification (58 and 61 percent, respectively).

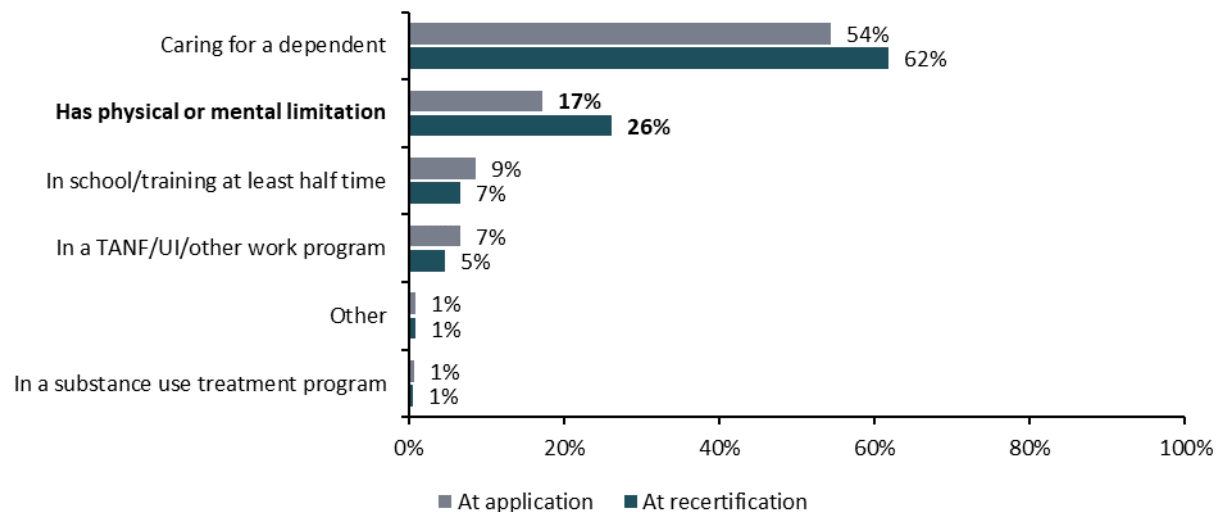
Figure 6.1. Determination at Application and Recertification: Not Subject to Work Requirements



At application N= 149,636; At recertification N= 231,796
Source: Mathematica analyses of Wisconsin administrative SNAP data (September 2023-November 2023)

Presence of a physical or mental limitation was the second most prevalent exemption code after caring for a dependent (figure 6.2).⁵¹ Among those determined not subject to work requirements, 17 percent were coded with a physical or mental limitation. For 28 percent of all applicants ages 16-59, eligibility workers would select only one code for exempting them from work requirements; hardly any applicants were determined not subject to the work requirements solely because of a physical or mental limitation (appendix table D.4a). The percentage of individuals coded as unfit for work due to physical or mental limitations was somewhat higher at recertification than at application. At recertification, just over one-quarter (26 percent) of all individuals who were determined not subject to work requirements were coded as having a physical or mental limitation.

Figure 6.2. Reasons for Being Determined Not Subject to Work Requirements, All Individuals Ages 16-59



At application N=149,636 at application; at recertification N=231,796

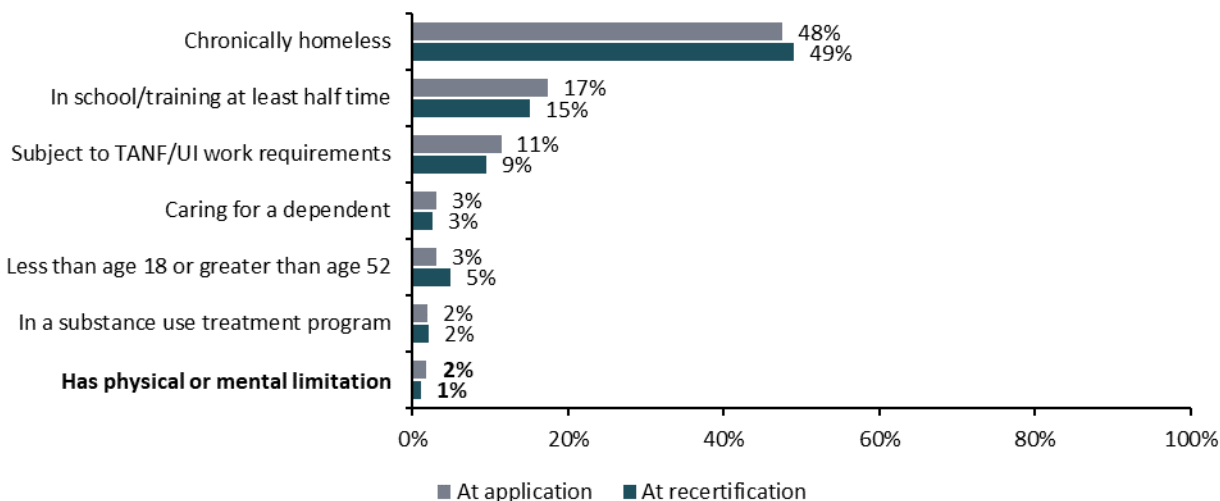
Note: Percentages do not add up to 100 percent because Wisconsin’s eligibility and benefit determination system allows eligibility workers to code multiple reasons why an individual may be determined not subject to work requirements.

Source: Mathematica analyses of Wisconsin administrative SNAP data (September 2023-November 2023)

Among ABAWDs determined not subject to the time limits, the most prominent reason for exception coded was chronic homelessness; eligibility workers coded almost half of ABAWDs determined not subject to the time limits with this reason (figure 6.3). Very few ABAWDs determined not subject to the time limits were coded as having a physical or mental limitation. These codes reflect physical or mental limitations beyond those that exempt people from the general work requirement given the somewhat broader definition in Wisconsin of “physically or mentally unfit for employment” for the ABAWD than the general work requirements.

⁵¹ Wisconsin did not code individuals working the requisite number of hours (at least 30 hours per week or earning wages at least equal to the federal minimum wage multiplied by 30 hours) as exempt from work requirements but rather as subject to and meeting work requirements. The percentage of individuals ages 16-59 with personal earned income could be considered an upper bound on the percentage of individuals who might qualify for an exemption from work requirements on the basis of their employment (we did not have data on the amount of personal earned income or hours of employment to determine more precisely which employed individuals might qualify for the exemption). Thirty percent of individuals ages 16-59 had personal earned income both at application and recertification.

Figure 6.3. Reasons for Being Determined Not Subject to Work Requirements, ABAWDs



Sample size: 42,471 at application; 30,848 at recertification

Note: Percentages do not add up to 100 percent because Wisconsin’s eligibility and benefit determination system allows eligibility workers to code multiple reasons why an individual may be determined not subject to work requirements. It is unclear why some ABAWDs are coded as caring for a dependent. Less than one percent of individuals were coded as “other” or “residing in an ABAWD waiver area”. Therefore, the classifications were omitted from the figure.

Source: Mathematica analyses of Wisconsin administrative SNAP data (September 2023–November 2023)

6.B.2 Patterns in Determinations at Application

Key findings from an analysis of patterns in fitness for work determinations include the following (table 6.2). Additional information and supplemental tables on patterns at application and recertification can be found in Appendix D.4.

Community characteristics. Applicants that lived in areas with lower unemployment were slightly more likely to be excused from work requirements due to physical or mental limitations than those in areas with higher unemployment (15 and 10 percent, respectively).⁵² Among those not subject to the requirements, applicants were more likely to have had a reason coded as something other than physical or mental limitations, regardless of the unemployment rate.

Income. Five percent of applicants with personal earned income were coded as having a physical or mental limitation. It was possible that at least some of these applicants were able to work but not at the level expected to meet the work requirements. Most applicants with income from Social Security or SSI were determined not subject to work requirements, but of those who are, a physical or mental limitation was coded as a reason why for only about half. It is possible that these applicants also had other reasons coded and that eligibility workers mistakenly did not record all reasons that could exempt them from the work requirements. When all income sources were considered, applicants with relatively higher household gross incomes (more than 50 percent of the FPL) were determined unfit because of a physical or mental limitation at much higher rates than those with relatively lower household incomes.

Household structure. Relatively few applicants with children in their households were determined subject to work requirements and most of them were excused for reasons other than a physical or mental limitation—most likely caring for a dependent. Additionally, applicants with children in their

⁵² Low unemployment rate is defined as being less than 10 percent.

households were much less likely to be coded as having a physical or mental limitation than those without children in their households. Patterns did not vary by whether there was a single adult or multiple adults in the household. Applicants who were homeless are almost never determined subject to work requirements.⁵³ About nine percent of applicants who were homeless were coded in the data as unfit for work because of a physical or mental limitation.

Disability status. Among those coded as having a disability, 12 percent are determined subject to work requirements.⁵⁴ It is possible that SNAP eligibility workers found that these applicants' specific disabilities did not interfere with applicants' ability to work. Among those who were not coded as having a disability, very few were coded as having a physical or mental limitation for purposes of the work requirement determination. It is possible that eligibility workers mistakenly did not code some of these applicants as having a disability.

Other demographic characteristics. Older applicants were much more likely than relatively younger ones to be coded as unfit for work because of a physical or mental limitation. Though females were about half as likely to be determined subject to work requirements, they were excused because of physical or mental limitations at about the same rate as males. These results are likely driven by a relatively higher percentages of females caring for a child under 6 or an incapacitated person. The percentage of missing data (65 percent among all applicants aged 16-59) is too high to meaningfully interpret patterns in determinations by race, and Wisconsin's system did not contain data on ethnicity.

⁵³ About 12 percent of applicants (18,025 of 149,636) were coded in Wisconsin's data system as homeless in a separate field from exemption/exception reasons which did not distinguish between chronic homelessness and general homelessness. The exemption/exception reason was labeled "Unfit for work (chronically homeless)." Most applications in the analysis were processed before enactment of the 2023 Fiscal Responsibility Act, which amended the 2008 Act to excuse individuals experiencing homelessness from the ABAWD work requirement and time limit. About 1 percent of ABAWDs who were coded in Wisconsin's data system as homeless in a separate field from exemption and exception reasons were determined unfit for work because of a physical or mental limitation at application (not shown).

⁵⁴ About 21 percent of applicants ages 16-59 (31,996 of 149,636) were coded in Wisconsin's data system as having a disability in a separate field from exemption/exception reasons.

Table 6.2. Determinations at Application, by SNAP Applicant Characteristics

	Coded as having a physical/mental limitation	Not coded as having a physical/mental limitation	Percentage of individuals ages 16 to 59 determined subject to work requirements and/or time limits	Number of individuals ages 16 to 59
Urbanicity of applicant's zip code				
Metropolitan	14.1	69.6	16.3	111,016
Micropolitan	15.0	67.4	17.6	15,293
Rural	15.8	68.0	16.2	23,286
Unemployment in applicant's zip code				
Less than 10%	15.0	67.8	17.2	133,617
10% or greater	9.8	80.5	9.7	13,649
Avg. income in applicant's zip code				
Below state median	14.6	69.1	16.4	70,375
Above state median	14.4	68.9	16.6	76,841
Gross household income as percentage of the federal poverty level				
0	4.7	63.1	32.2	58,386
1-25	5.7	78.2	16.2	8,860
26-50	10.0	77.5	12.4	10,316
51-75	23.6	65.2	11.2	14,077
76-100	40.4	57.0	2.6	19,745
101-130	18.5	70.0	2.5	19,062
130+	13.4	84.2	2.4	19,190
Personal earnings				
Yes	4.9	88.0	7.1	44,712
No	18.5	61.1	20.4	104,924
Personal Social Security or SSI income				
Yes	46.1	42.1	11.8	28,626
No	7.0	75.5	17.5	121,010
Children (under age 18) in household				
Single adult	7.6	92.1	0.3	34,861
Multiple adult	6.3	93.5	0.2	31,797
No children in household				
Single adult	20.7	50.1	29.2	72,014
Multiple adult	20.6	47.1	32.2	10,359
Homeless				
Yes	9.2	87.7	3.1	18,025
No	15.2	66.5	18.2	131,611
Coded with a disability				
Yes	64.1	23.9	12.0	31,996
No	1.0	81.4	17.6	117,640
Gender				
Female	13.6	74.5	11.9	80,473
Male	15.5	62.8	21.6	69,163
Age				
16 to 30	8.8	72.8	18.4	64,844
31 to 45	12.0	69.5	18.5	55,188
46 to 59	31.5	60.3	8.2	29,604
Total N	21,673	103,398	24,565	149,636

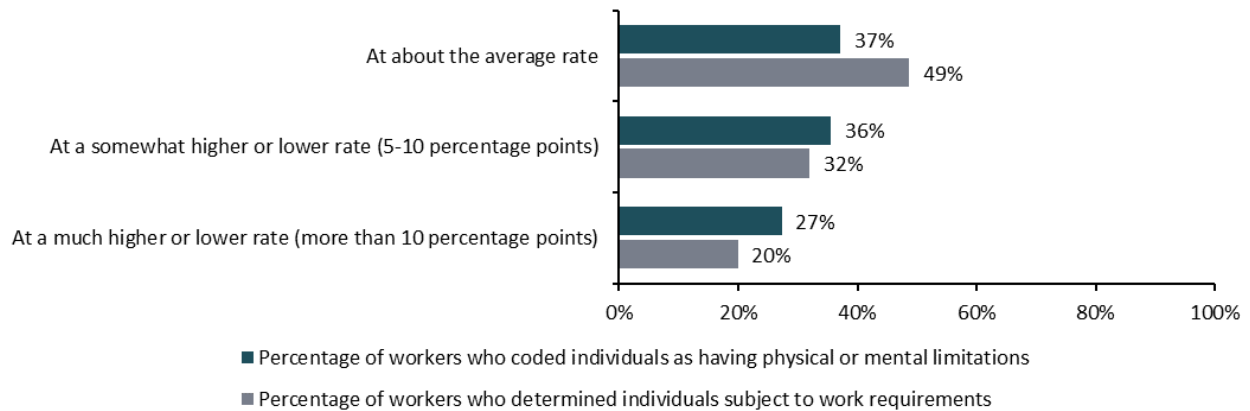
Source: Mathematica analyses of Wisconsin administrative SNAP data (September 2023-November 2023)

Note: Missing data range from 0 to 3 percent. Some row percentages sum to more than 100 due to rounding.

Eligibility workers making determinations. Variability existed in the determination decisions eligibility workers made. Of 1,315 workers, almost half determined applicants were subject to work

requirements at about the average State rate of 16 percent (figure 6.4).⁵⁵ About one-fifth determined applicants as subject to work requirements at a much higher or lower rate (by more than 10 percentage points) than average. A smaller percentage of eligibility workers coded applicants as having a physical or mental limitation at about the average rate of 15 percent among all individuals ages 16-59 (37 percent). More than one-quarter coded applicants as having a physical or mental limitation at a much higher or lower rate than average. No notable patterns emerged in determinations by worker tenure or whether the worker started their job before or after the COVID-19 pandemic (see appendix D.4k).

Figure 6.4. Determinations at application, by eligibility worker



N = 1,315

Source: Mathematica analyses of Wisconsin administrative SNAP data (September 2023-November 2023)

Note: Average rate for determined subject to work requirements is 16.4 percent; average rate for coded as having a physical/mental limitation is 14.5.

6.B.3 Differences in Determination Patterns at Application and Recertification

Patterns in determinations at recertification mirrored patterns at application with the following notable exceptions or ways in which application patterns became more pronounced. Supplemental tables for recertification data are in Appendix D.4.

- Unlike at application, at recertification participants were about as likely to be determined subject to work requirements whether they lived in an area of relatively high or low unemployment.
- By recertification, participants in single-adult childless households were less likely to be determined subject to work requirements and more likely to be coded as unfit because of a physical or mental limitation than participants in multiple-adult childless households.
- A smaller percentage of those coded with a disability were determined subject to work requirements at recertification than at application.
- By recertification, a much higher percentage of those with personal income from Social Security or SSI were determined unfit for work because of a physical or mental limitation than at application.
- A somewhat higher percentage of individuals ages 16-59 were coded as having a disability at recertification than at application. Additionally, a much higher percentage of them were coded as unfit for employment because of a physical or mental limitation at recertification than at application.

⁵⁵ In total, 1,793 different eligibility workers made determinations for the applicants in this analysis. To identify differences in determinations among them we excluded workers who had made fewer than 20 determinations each.

- Determinations by eligibility worker were less variable at recertification than at initial application. Almost three-quarters of workers determined applicants as subject to work requirements at about the average rate, up from almost half at application. About a similar percentage at application and recertification coded applicants as having a physical or mental limitation at a much higher or lower rate than average.

6.C. Good Cause Determinations

As stated in the Wisconsin FoodShare policy handbook, someone subject to the general or ABAWD work requirements may receive a good cause determination if the participant “has personal health problems, or others in the food unit have health problems requiring the presence of the applicant or member.”

The State communicated policies on good cause determinations through the same avenues that it communicated about policies on fitness for work determinations. As with fitness for work determinations, the topic of good cause determinations was covered in new worker training and was available but not State-mandated in annual worker training.

6.C.1 Process for Making Good Cause Determinations

Eligibility workers only made good cause determinations if an existing SNAP participant did not comply with work requirements. Both eligibility workers and FSET staff were able to make good cause determinations in CWW directly, but respondents reported that FSET staff most commonly made this determination. Eligibility and FSET staff were prompted with an alert in CWW when the other completed a good cause-related action. For example, the eligibility worker would be assigned a task to reassess eligibility if FSET staff implemented or reversed a good cause determination.

Participants were encouraged to notify an eligibility worker of the circumstances of their noncompliance so that the worker could assess the possibility of good cause. If noncompliant participants did not proactively communicate with an eligibility worker, the policy handbook stated that the worker “must explore potential good cause with the applicant or member. Exploration can include a verbal conversation with the member, attempting to contact a member, or sending the member a letter requesting this information. Workers must document steps taken to explore good cause in [CWW] case comments.⁵⁶” As with exemptions and exceptions, verification of good cause was not required unless an eligibility worker received conflicting or unclear information about the good cause reason. For work registrants, eligibility workers determined good cause after each instance of non-compliance. If good cause existed, eligibility workers took no additional action; if it did not, eligibility workers imposed a sanction. For ABAWDS, eligibility workers or FSET staff would document one month of non-compliance in CWW, unless the participant informed them of a good cause reason within the first 10 days of the following month.

⁵⁶ Wisconsin FoodShare policy handbook

6.D. Challenges and Key Takeaways

State and local staff faced several challenges, including frequent policy changes, delays in updating the data system, and unclear application language. Interviews with staff also revealed mixed feelings on the updated verification requirements, inconsistencies in determinations of exemptions and exceptions, and collaboration between eligibility workers and E&T staff.

6.D.1 Challenges

Frequent policy changes during the COVID-19 public health emergency. While staff noted that they appreciated DHS's process for communicating policy changes and were satisfied with the State trainings related to work requirements, the pandemic and the rolling back of COVID-19 flexibilities brought many changes to which staff at all levels struggled to adjust. Eligibility workers assisted FoodShare participants in addition to participants in other programs administered by the Division of Medicaid Services and needed extensive knowledge of multiple complicated programs to do their jobs. The pandemic-related changes across programs have been difficult to learn about and implement.

Unclear application language. Respondents noted that the language about fitness for work in the FoodShare application was unclear. One local administrator thought the questions around physical or mental limitation should be more specific to minimize respondents' varied interpretations. Some eligibility workers also mentioned that the text at the end of the application summarizing the work requirements and exemptions and exceptions should be more concise and streamlined to avoid confusing applicants.

6.D.2 Key Takeaways

Mixed feelings on updated verification requirements. The recent change abolishing the requirement to obtain verification of a physical or mental limitation elicited mixed reactions among frontline staff. Eligibility workers in the urban county found the change to be helpful. They thought it saved staff time and reduced the burden on customers. However, they reported that the process of collecting verification sometimes felt invasive, and participants were frustrated by having to resend verifications at every recertification. FSET staff and the local administrator in the urban county also reported that they saw this change as positive for SNAP participants. In contrast, eligibility workers in the rural county reported that not requiring verification put extra responsibility on their shoulders to make the correct determination and sometimes forced them to ask more questions about customers' conditions, which sometimes felt invasive. Rural county staff reported that they received extensive guidance from their agency not to over-verify, but the agency simultaneously required them to maintain program integrity. They felt that these demands were conflicting.

Inconsistencies in determining exemptions and exceptions. Findings from the interviews and administrative data analysis confirmed that there was some variability in how eligibility workers applied exemptions and exceptions. FSET staff in the rural county reported inconsistencies in the application of exemptions and exceptions between different eligibility workers. They indicated these inconsistencies were more prevalent in recent months since the reinstatement of the ABAWD time limit; they anticipated that the issue would improve somewhat as eligibility workers reaccustom themselves to the work requirements and time limit. State staff reported that they have struggled to find a balance between providing a clear, rigid set of guidelines and allowing frontline staff flexibility when making fitness for work determinations.

Staff also noted that there could be inconsistencies based on how the individual applied. For example, applicants applying for SNAP over the phone or in person may have more opportunity to correctly report unfitness for work than those applying online or through a mailed paper application because eligibility workers probe them on potential exemptions or exceptions at the end of the application process.

Collaboration between eligibility workers and E&T staff streamlined the process. Co-location of eligibility workers and E&T staff could improve collaboration around and the soundness of fitness for work determinations. Local administrators, eligibility workers, and FSET staff in the rural county reported a particularly strong, collaborative relationship between the eligibility workers and E&T agencies, who shared a physical office building together. FSET providers in the rural county felt comfortable reaching out to eligibility workers, who were easily accessible in person, if they had questions about a case or if they felt an individual may have been eligible for an exemption or exception.

7 Summary of Key Findings

The policies and processes for making fitness for work and good cause determinations varied across State agencies. This chapter provides a high-level overview of key findings and conclusions drawn from the survey of State SNAP Agencies, review of applicable State policy or guidance documents and case studies in four States. Findings from the case studies highlighted the nuances in how and when State agencies granted exemptions, exceptions, and good cause determinations.





7.A. Policies and Guidelines

Almost all State agencies reported in the survey that the State SNAP agency is responsible for codifying and updating policies and procedures on granting exemptions or exceptions from work requirements due to physical or mental limitations. State agencies primarily relied on federal regulations, statute, or guidance when updating their policies and procedures, and they reviewed policies for exemptions or exceptions from work requirements only when changes in federal regulations, statute, or guidance occurred. These findings were consistent across the four case study States. However, three of the Case Study States, Georgia, Maryland, and Wisconsin, allowed local sites the flexibility to operationalize the policies depending on the structure of their jurisdiction (e.g., staffing structure).

7.B. Process for Making Fitness for Work Determinations

There was some variation in the screening process for physical and mental limitations across State agencies based on findings from the survey and case studies. Exhibit 7.1 provides a summary of the process for making fitness for work determinations in each of the case study States.

Exhibit 7.1. Summary of Fitness for Work Determinations by Case Study State

	 Georgia	 Maryland	 Texas	 Wisconsin
Application	Individuals not explicitly asked about disability on application.	Application asked if anyone in household is disabled.		Application asked if anyone in household is unable to work because of illness or injury.
	Certain information was asked on application that could indicate disability (e.g., receiving disability income).			
Interview	Eligibility workers determined fitness for work during eligibility interview. Staff probed on certain topics (e.g., housing) to identify any limitations.	State did not require interviews at the time of the site visit.		
Verification	Individuals automatically granted exemptions or exceptions if receiving disability benefits.			
	Verification (e.g., doctor’s note) required if limitation was not obvious.	Some offices always required verification, while others only required verification if limitation was not obvious.	Verification (e.g., medical form, physician’s statement) was always required.	Verification (e.g., doctor’s note) required if limitation was not obvious.
Determination	Eligibility workers made final determination on exemptions and exceptions.	Eligibility workers made final determination on exemptions and exceptions.	Eligibility system automatically made exemption or exception determination based on information eligibility workers entered into the system.	Eligibility workers made final determination on exemptions and exceptions.
Recertification	The process for making fitness for work determinations at recertification did not vary from the application process.			
Appeals	Applicant submitted a request for appeal if they did not agree with fitness for work determination. A separate department handled making final determination on appeals.			

Within State agencies, the process for determining exemptions from the general work requirement and exceptions from the ABAWD work requirement generally did not differ. Findings from the survey revealed that within each State, the screening process for making exemptions from the general work requirements and exceptions from the ABAWD work requirements were generally the same. This included the staff involved in making the determination, types of physical and mental limitations considered, when individuals were first asked about limitations, and when participants could have their exemption or exception status reassessed.

Allowing staff discretion in making fitness for work determinations was more common than allowing local variation. State agencies intended for policies and guidelines to be applied uniformly throughout the State. In the survey, few State agencies allowed for local variation in the populations that eligibility workers screened for exemptions or exceptions (0 percent for the general work requirement, 4 percent for ABAWD work requirement), types of verification that was allowed (6 percent for general work requirement and 10 percent for ABAWD work requirement), or the physical or mental limitations considered (14 percent for general and ABAWD work requirement). However, over half of State agencies (56 percent) allowed staff to use discretion in the types of physical or mental limitations that eligibility workers could consider when determining exemptions or exceptions.

Three of the four case study States allowed for some discretion among eligibility workers while making determinations, which revealed some challenges. In Georgia and Wisconsin, staff discussed that there were inconsistencies between eligibility workers who made determinations. In addition, some Maryland eligibility workers expressed a desire for a more standardized and straightforward process for making fitness for work determinations because of physical or mental limitations. Staff in Texas did not have as much discretion because eligibility workers always required verification for physical and mental limitations, taking any decision-making around physical or mental limitations out of the eligibility workers' hands.

State agencies usually first asked about physical and mental limitations on the applications. In the survey, about two-thirds of State agencies (66 percent for general work requirements and 62 percent for ABAWD work requirements) reported that applicants were first asked about physical or mental limitations on the application. Findings from the case studies revealed some variation in whether applicants were asked about physical or mental limitations on the application and how much information from the application was considered while making determinations. For example, the Georgia SNAP application did not explicitly ask about disabilities or fitness for work, and exemptions and exceptions were usually determined during the interview. Meanwhile, Wisconsin eligibility workers almost exclusively relied on information from the application when making determinations.

Interview processes for screening for physical or mental limitations did not differ based on if the interview was conducted over the phone or in-person. At the time of the survey, most State agencies (96 percent) reported that they did not require face-to-face interviews as part of the SNAP application process. Of the State agencies that did not require face-to-face interviews, most (80 percent) indicated that the process for screening individuals for mental or physical limitations did not differ regardless of if applicants interviewed face-to-face or not. However, eligibility workers in Georgia noted that fitness for work determinations were harder to determine over the phone since limitations were not as easily visible.

Case study States highlighted the importance of using certain interview probes to identify physical and mental limitations and ensure consistency in determinations. Maryland staff proposed adding a set of questions to their eligibility system so that during interviews, they would know what to probe on related to barriers to working (e.g., problems with mobility). Not only would this have helped identify mental or physical limitations, it would have also ensured consistency across eligibility workers. Georgia eligibility workers noted the importance of probing on applicants' housing situations because being homeless often coincides with having a physical or mental limitation.

Verification for physical and mental limitations was most often required when the limitation was unclear. Survey findings revealed that most State agencies reported sometimes requiring verification of physical and mental limitations, regardless of interview mode (84 percent for face-to-face and 71 percent for non-face-to-face). State agencies that reported verification was sometimes required most commonly reported requiring verification if the severity of the limitation or functional limitations of the client’s condition was unclear, regardless of mode (64 percent for face-to-face interviews and 60 percent non-face-to-face interviews). Among those who always required verification for physical or mental limitations, a larger percent reported doing so to grant exemption or exceptions for applicants who did not complete a face-to-face interview (25 percent) than those who did (10 percent).

Requiring or encouraging verification of physical or mental limitations was one way to encourage consistency and reduce staff burden. In Texas, staff noted that their process for making fitness for work determinations was “cut and dry” since eligibility workers almost always required verification for physical and mental limitations. They appreciated this practice and did not believe additional flexibility would be beneficial. Similarly, eligibility workers in one Maryland local office always required verification of physical and mental limitations and felt it removed some of the pressure from eligibility workers’ roles. Some eligibility workers in Wisconsin also felt that removing the requirement for verification put a lot of responsibility on their shoulders to correctly determine if someone should or should not be excused from work requirements. However, staff also noted that requiring verification increased the burden on applicants and participants.

State agencies reevaluated individuals for exemptions and exceptions during the recertification process, which was similar to the determination process at application. Most State agencies reevaluated individuals who had received an exemption or exception during the previous reporting period for the general work requirement (94 percent) and ABAWD work requirement (92 percent) at recertification. Similarly, individuals that did not have an exemption or exception during the previous certification period were also reevaluated (98 percent for general work requirements and 96 percent for ABAWD work requirements) during recertification. The process for determining exemptions or exceptions due to physical or mental limitations at recertification did not differ from the process at application among case study States.

Similar physical and mental limitations were considered for exemptions from the general work requirement and exceptions from the ABAWD work requirement. State agencies typically considered the same physical and mental limitations when excusing participants from the general and ABAWD work requirements. The most common included long-term physical disability (98 percent for general work requirement and 96 percent for ABAWD work requirement), long-term physical illness (98 percent for general work requirement and 96 percent for ABAWD work requirement), cognitive or developmental disabilities (98 percent for general and ABAWD work requirement), mental illness (98 percent for general and ABAWD work requirements), short-term physical injury (94 percent for general and ABAWD work requirements), and short-term physical illness (94 percent for general and ABAWD work requirements).

Most State agencies allowed applicants or participants to appeal fitness for work determinations. Over three-quarters of State agencies (78 percent) allowed applicants to appeal an exemption or exception decision for general work requirements and ABAWD work requirements. However, from the case studies it was clear that it was uncommon to appeal decisions related to fitness for work determinations. This was likely because individuals could provide verification if eligibility workers found their situation unclear or questionable. Findings from the case studies also

revealed that the process for appealing fitness for work determinations were largely consistent across States.

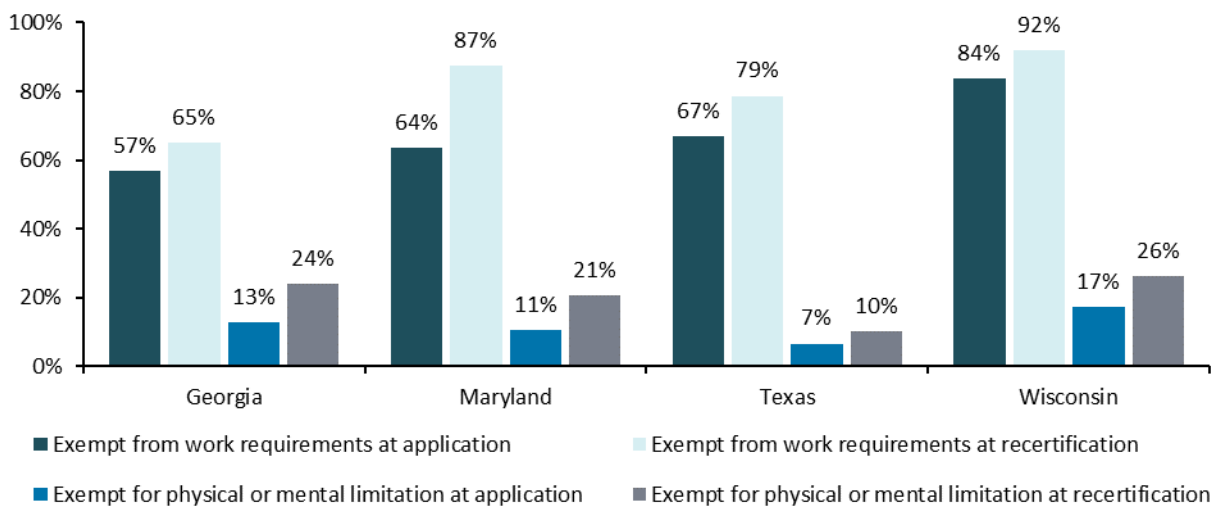
7.C. Trends in Fitness for Work Determinations Among Case Study States

State administrative SNAP data from the four case study States provided insight into the rate at which the four States issued fitness for work determinations and whether any patterns or trends in fitness for work determinations existed within and across the States.

Exemptions due to physical or mental limitations are relatively uncommon. In each case study State, well over half of SNAP applicants ages 16 to 59 were exempt from the general work requirements (figure 7.2). Rates at which individuals were exempt because of physical or mental limitations at application ranged across the four States from 7 to 17 percent.⁵⁷

Exemption rates at recertification were higher than at initial application. The proportion of participants exempt from the general work requirements was higher at recertification than at application in all case study States, and the proportion exempt because of a physical or mental limitation at recertification was as high as one-quarter. A higher percentage of individuals may have been determined to have physical and mental limitations at recertification than at application for several reasons. For example, some of those who were physically and mentally able to work may have found employment before recertification and left SNAP, resulting in a greater proportion of adults on the caseload at recertification who were unfit for employment. Additionally, disabling conditions may have surfaced as eligibility workers or E&T service providers got to know participants or as participants who did not initially reveal their conditions were unable to meet work requirements and subsequently granted exemptions because of their limitations.

Figure 7.2. Percentage Exempt from General Work Requirements at Application and Recertification, All Individuals Ages 16-59



At application N= 208,155 for Georgia, 372,765 for Maryland, 828,289 for Texas, and 149,636 for Wisconsin; at recertification N =280,083 for Georgia, 126,043 for Maryland, 537,782 for Texas, and 231,796 for Wisconsin

⁵⁷ Each case study State's data system, except Wisconsin's, allowed eligibility workers to code only one reason for exemption from the general work requirements.

Exceptions from time limits on benefits because of physical or mental limitations are rare. Within three of the four States, the percentage of ABAWDs who were not subject to time limits on benefits because of a physical or mental limitation beyond that which would exempt them from the general work requirement was 2 to 3 percent at both application and recertification. In Maryland, 8 percent were not subject to time limits on benefits for this reason at recertification.

Disability flags that exist in State data systems were not reliable indicators for individuals exempt from work requirements because of physical or mental limitations. Each case study State had a disability flag in its data system that was distinct from work requirement exemption reason codes. In three of the four case study States, a non-trivial percentage of applicants coded as having a disability in this field were subject to the general work requirements (9 percent in Georgia, 28 percent in Maryland, and 12 percent in Wisconsin).⁵⁸ Possibly, SNAP eligibility workers found these applicants' specific disabilities did not interfere with applicants' ability to work. Conversely, in each State, a small number (1 to 2 percent) of those not coded as having a disability were determined exempt from the work requirements because of a physical or mental limitation.⁵⁹ Possibly, eligibility workers mistakenly did not code some of these applicants as having a disability in the separate disability flag.

While patterns in determinations generally did not vary by community characteristics, various individual or household characteristics decreased the likelihood of being determined unfit for work because of a physical or mental limitation. The following types of applicants in each case study State were less likely to be determined unfit for work because of a physical or mental limitation: applicants living with children (compared to those without children in their households); females (compared to males); and relatively younger applicants (compared to those over age 30). Results may have been driven by a relatively higher percentage of those with children in their household, females, and younger applicants caring for a child under six or an incapacitated person and determined exempt from work requirements for that reason.

Some variability in determinations existed among entities making the determinations. There was not substantial variation in the rate at which offices in Maryland and eligibility workers in Texas determined individuals to be not subject to work requirements due to a physical or mental. In Maryland, three-fourths of local offices determined individuals to be not subject to work requirements due to a physical or mental limitation at about the average rate, with only 3 percent of local offices determining individuals to be physically or mentally unfit at a much higher or lower rate (more than 10 percentage points). Similarly, in Texas most eligibility workers determined individuals to be not subject to work requirements for being physically or mentally unfit (82 percent) at the average rate, with only 5 percent doing so at a much higher or lower rate. There was more variability in fitness for work determinations in Wisconsin among eligibility workers, with more than one-quarter coding applicants at a much higher or lower rate.

7.D. Good Cause Determinations

Based on survey findings, the process for determining policies and procedures about good cause determinations were similar to the process for making exemptions and exceptions. State agencies primarily utilized federal regulations, statutes, or guidance. In addition, many of the physical and mental limitations State agencies considered for a good cause determination (e.g., short-term

⁵⁸ The percentage was lower in Texas (1 percent), where unlike in the other States, the disability flag was synonymous with receipt of SSI; receipt of SSI automatically qualifies someone for an exemption from the general work requirements.

⁵⁹ The percentage was higher in Texas (5 percent), which may reflect the fact that the disability flag was synonymous with receipt of SSI in this State, and physical or mental limitations that don't qualify someone for SSI may still qualify them for an exemption from work requirements.

physical injury, long-term illness) could also be considered for an exemption or exception. This implies there were not usually specific physical or mental limitations dedicated specifically to good cause versus exemptions or exceptions. Unsurprisingly, most State agencies also reported that a good cause determination could lead to an exemption or exception.

Findings from the case studies revealed some discrepancies between staff's application of good cause determination policies and knowledge of when to use good cause versus exemptions or exceptions. In Maryland, some eligibility workers used the term "good cause" interchangeably with "exemptions and exceptions." They noted significant overlap between physical and mental limitations that would be eligible for good cause determinations and exemptions or exceptions. In Georgia, eligibility workers reported the processes for determining exemptions and exceptions and good cause both occur at initial application or recertification while the policy manual assesses good cause prior to issuing a sanction for non-compliance in work requirements. Georgia staff specified that they typically used good cause for shorter-term issues and exemptions or exceptions for longer-term limitations.

7.E. Involvement of E&T Programs

The involvement of E&T programs in the fitness for work determination process varied among the case study States. For example, in Maryland, E&T providers usually did not communicate with local SNAP staff to express if they believed someone qualified for an exemption, exception, or good cause determination. The responsibility was on the participant to communicate this information. Staff in Texas and Wisconsin highlighted the collaborative relationship between E&T providers and eligibility workers. In Wisconsin, rural E&T staff and eligibility workers shared a physical office. Staff reported that the co-location allowed for both E&T staff and eligibility workers to easily reach out to one another and allowed them to build a collaborative relationship.