



Changes to SNAP Starting **September 1**: Work Requirements & Time Limits

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Agenda for Today

- What is the time limit/ work requirement?
- When is it going into effect?
- Who is exempt from the time limit?
- How do you prove an exemption?
- How do you comply with the work requirement?
- What happens if you aren't exempt and don't comply?
- How will people know about the requirement?
- Cuts to immigrant eligibility
- How can others help?



Background on SNAP

- Supplemental Nutrition Assistance Program (aka "Food Stamps")
- Nearly 2 million Pennsylvanians receive SNAP.
 - 30% of Philadelphians are on SNAP - nearly half a million
- \$354 million a month in federally-funded benefits into PA
 - Average SNAP amount is about \$180/month/person
- Eligible households are under 200% of the poverty level



HR 1 Changes to SNAP

- Harsher work requirements
 - Starting September 1
 - To be covered today
- Cost shift to states
- Cuts to immigrant eligibility – to be covered today
- Other cuts to admin funds and to benefits



Background on SNAP Work Requirements and Time Limits

- **1996 Welfare Reform (PRWORA)**
 - Congress time-limited SNAP to 3 months in 3 years unless meeting work requirement
 - Applied to adults without dependents ages 18-50 unless **exempt** or in an area covered by a **geographic waiver**
 - Expanded to age 55 in 2023
- **Changes with HR 1 (2025 budget megabill)**
 - More expansion of time limit – effective in PA Nov 1



Why haven't most Pennsylvanians on SNAP been affected by work requirements?

- **Geographic waivers**

- Philadelphia and many areas of PA have always qualified for a waiver as an **area of high unemployment** – current waiver ends August 31
 - Sought by all PA Governors since 1996

- **Statewide pandemic-era waiver, with discretionary exemptions** – ended in May 2025



HR 1 Changes

- Essentially eliminated geographic waivers
- Expanded the group of people subject to time limit
 - Increased the age range to 65
 - Includes parents of kids 14+
- Eliminated exemptions added in 2023:
 - Homeless, veterans, former foster youth
 - PA will continue to exempt homeless people, using state discretionary exemptions



What does this mean for Pennsylvanians?

- Work requirements for many adults (18-54 without children under 18 in household) will become effective **Sept. 1, 2025**
- 55-64-year-olds & households with youngest child 14+ will begin being subject to time limit starting **Nov. 1, 2025**
- If not meeting the work requirement or exempt, SNAP benefits are time-limited to **3 months in a 3-year period**
- If subject to work requirements, you must work 80 hours/month (average of 20 hours/week)



What does this mean for Pennsylvanians?

All SNAP recipients will fall into one of the following categories:

1) EXEMPT

Do not need to meet work rules, safe until next renewal

2) COMPLYING

Need to meet work rules and report if you stop

3) TIME-LIMITED/NONCOMPLIANT

Not complying or exempt – 3 month time limit



The stakes

- The 3-month time limit is an **off-ramp from SNAP**
- Prior experience shows almost 2/3 of non-exempt people subject to the time limit lose SNAP after 3 months
- PA DHS estimates **~144,000 Pennsylvanians** will lose SNAP once work requirements start
 - 45,000 in Philadelphia
- Establishing an **exemption** is the key to keeping SNAP!



Timing

- For people up to age 55, without kids under 18, the time limit starts **September 1**. First cutoffs for failing to meet the work requirement will be December 1.
- For people 55-64 and parents of kids 14+, the time limit will be rolled out over time, starting **November 1**.
 - New applicants will be subject to the time limit right away.
 - Current recipients will not be subject until their next renewal.





Who is Exempt?

Federal Exemptions

- Age: 65+ (**age 55+ until DHS implements HR 1**) or under 18
- In SNAP household with child under 14 (**under 18 until DHS implements HR 1**)
- Receiving a disability benefit (SSI, SSD, disability-related Medicaid, etc.)
- Receiving or applied for Unemployment Compensation (UC)
- **Have a medical condition that reduces your ability to work**
(more later)



More Federal Exemptions

- Participating in a SUD, mental health, or voc rehab program
- Pregnant
- In school or job training at least half time
- Caring for elderly or disabled household member
- **Working at least 30 hours/week or earning at least \$217.50/week**
 - **NOTE: despite working, these folks should be considered exempt, not just complying.**



Federal Exemption: Medical condition reducing ability to work

- Many conditions reduce your ability to work!
 - E.g., conditions causing pain, fatigue, shortness of breath
 - E.g., depression, anxiety
- **Medical Exemption Form (PA 1921) signed by provider**
 - Does not require a doctor signature – can be signed by wide array of providers
 - Ex: Social worker, therapist, nurse, PA, etc.
 - Any medical personnel who can be reimbursed by Medicaid



State exemptions

- State gets a certain number of discretionary exemptions (8%)
- **Current state exemptions - people who are:**
 - Expecting to return to work within 60 days
 - Living more than 2 hours round-trip from an education or training site
 - Receiving expedited SNAP (only in first month on SNAP)
 - Volunteering full time through VISTA program
 - **Experiencing homelessness**
 - **Domestic violence survivors**



How do you prove an exemption?

- People under 18 or 55+ (65+ after Nov. 1) – CAO knows
- People receiving disability benefits – CAO knows
- People earning over \$217.50/week – paystubs, unless already submitted with application or renewal
- People with medical conditions – PA 1921 form
 - Maybe other medical evidence
- All other exemptions: only need to be verified if “questionable”



How will DHS notify recipients of the time limit and exemptions?

- **Current recipients:**

- Checklist screening for exemptions (CM 588) mailed to all affected recipients in August
- Information in eligibility notices is buried (*many* pages into packet)
- Discussed at renewal interviews
- Not clear yet whether DHS will send screening form to people newly subject to the time limit in November

- **New applicants:**

- Should be discussed during their interview and included in their eligibility notice





RECIPIENT NAME:	
COUNTY:	CASE NUMBER:

Adults who are healthy and able to work, and who do not live with children under 14, have to a time limit on their SNAP benefits. After receiving benefits for three months, they need to show they are meeting certain work-related rules or qualify for an exemption to keep getting benefits. They can meet these rules by working at least 20 hours a week or taking part in approved training programs, or a mix of both. If this applies to you, you will receive another letter with more information.

To help us determine if you are eligible for an exemption, please complete the survey below and return it to us in the enclosed postage-paid envelope as soon as possible - preferably within 10 days:

Individual and Household Questions - Circle Yes or No:

- Yes No Is anyone in your house age 13 or younger?
If yes, do you purchase and prepare your meals with this person? Yes No
- Yes No Are you pregnant?
- Yes No Is your ability to work at least 20 hours a week limited by your physical or mental health?
- Yes No Are you receiving or have you applied for any disability or sick benefits, such as SSI, Workers' Compensation, Veterans Disability Benefits, or vocational rehabilitation services?
- Yes No Are you caring for an ill or disabled household member?
- Yes No Are you participating in a drug or alcohol treatment program?
- Yes No Are you unable to work because of domestic violence? Circle Yes if:
• You or your children will be at risk of being harmed if you work, or
• It will be more difficult for you to recover from abuse if you work.
- Yes No Are you homeless or facing homelessness?
- Yes No Are you receiving or have you applied for Unemployment Compensation?
- Yes No Do you expect to return to work within the next 60 days?
- Yes No Are you a migrant or seasonal farmworker returning to work within 30 days?

Employment, Training, and Community Service Questions - Circle Yes or No:

- Yes No Are you working?
If yes, where? _____
How many hours a week? _____ What is your hourly rate? _____
- Yes No Are you taking classes to learn English or earn a GED?
If no, are you interested in taking free classes? Yes No
- Yes No Are you in school or a training program?
If yes, what are you studying? _____ How many hours a week? _____
If no, are you interested in going back to school? Yes No
- Yes No Are you doing community service or volunteering with a local agency?
If yes, where? _____ How many hours a week? _____
If no, are you interested in volunteering? Yes No

Action steps for people who meet an exemption

- Make sure the CAO knows the person is exempt
 - Complete DHS screening checklist when they get it in the mail this month (**CM 558**)
 - Fillable version coming soon to CLS's web site
 - Complete medical exemption form (**PA 1921**) if needed
 - Return both forms to CAO ASAP



Exemption example: Maria

- Maria works 20 hours a week at \$11 per hour.
- She also cares for her elderly mother, who lives with her, unpaid.
- Maria also has bad asthma.

Does Maria have to comply with work requirements?



Maria's exemptions

- Maria is EXEMPT because she earns over \$217.50 a week. This exemption will protect her SNAP if her hours get cut.
- Maria is also exempt because she is a caregiver. The caregiver exemption does not require verification unless it is “questionable,” but she has to let the CAO know.
- Maria may also be exempt because of her asthma. She could ask her doctor to sign the PA 1921 form.





Complying with the work requirement

How to comply if not exempt

1. Working 20 hr/wk

- Need not be at minimum wage – could even be paid in-kind
- Hours can fluctuate – just need to get to 80/month
- Can request "good cause" if some hours are missed for a reason outside your control (such as a medical emergency)
- Recall that earning \$217.50 a week or more makes you EXEMPT (so there won't be that many people in this category of compliance)
- Can be combined with employment & training or community service to get to 20 hours/week.



How to comply if not exempt

2. Participating in an employment & training program 20 hr/wk

- Such as SNAP E&T (JETS) or CareerLink program – not enough of these

3. Community service / volunteering

- Can volunteer at any nonprofit
- Have nonprofit complete the **PA 1938** form every 6 months
- Number of hours required is SNAP grant divided by minimum wage
(e.g., \$292 max grant for 1 => 41 hours a month) ($292/7.25 = 40.3$)





**Noncompliance with
work requirement:
time-limited benefits**

What happens if someone doesn't comply with the work requirement?

- If current SNAP recipient and not exempt - must report immediately to CAO once hours drop below 80/month
- Become subject to the time limit - 3 months of SNAP in 3 years
 - 3 months can be used nonconsecutively
- Same set 3-year period for everyone
- Current period: **January 2023 - December 2026**
- Next period: **January 2027 – December 2029**



What happens when you exhaust the 3-month time limit?

- If a SNAP household of 1:
 - **Case will close** after 3 months of noncompliance
- If in a household with others who continue to get SNAP:
 - Become an ineligible household member
 - Rest of SNAP household's **benefit will decrease**
 - Ineligible member's income becomes pro-rated



How do you get back onto benefits after losing SNAP?

- Individuals who lose SNAP after exhausting the 3-month time limit can get back on benefits if they:
 - 1) **Become exempt**
 - OR
 - 2) **Start complying with work requirement**
- There's a one-time extra 3 months of SNAP for folks not complying, if they complied for at least one month after using up their first 3 months of time-limited SNAP



Compliance example: Tyrone

- Tyrone does some landscaping work in the summer and odd jobs the rest of the year, including some work for his landlord in exchange for reduced rent. His hours vary a lot.
- How might Tyrone show he's meeting the 20 hour/week requirement?



Tyrone's compliance

- If he applies while he's earning over \$217.50 a week, he's exempt and safe until his next renewal.
- The work for his landlord in exchange for a rent reduction counts. He'll need a letter from the landlord documenting the hours.
- The odd jobs might be combined with volunteering to get him to 20 hours/week.
- 60 days before he expects the landscaping job to start again, he'll qualify for a state exemption





Immigrant eligibility restrictions

Immigrant Eligibility Restrictions

Pre-OBBB eligible immigration statuses:

- Lawful permanent residents
- VAWA petitioners
- Asylees
- Refugees
- Cuban/Haitian entrants
- Withholding of removal
- Trafficking victims
- Special immigrants from Iraq or Afghanistan
- People from Afghanistan paroled after July 31, 2021 and from Ukraine paroled after Feb 24, 2022, until parole expiration.
- Others paroled into U.S. for at least 1 year
- COFA Migrants

OBBB eligible immigration statuses:

- Lawful permanent residents
- Cuban-Haitian entrants
- Compact of Free Association citizens from the Marshall Islands, Micronesia, and Palau (COFA migrants)

Effective **October 1, 2025**, per PA DHS



Eligible immigration statuses under OBBB

- Lawful permanent residents (LPRs). These are people with green cards.
 - Refugees, asylees, VAWA petitioners, T-Visa holders and Special Immigrants from Iraq/Afghanistan are all eligible, or may become eligible, for LPR status. **If they are LPR, they will retain SNAP eligibility. If they are not LPR, they will lose SNAP eligibility.**
 - The SNAP “five-year bar” rules have not changed at all. LPRs who have had a “qualified” immigration status for less than five years are ineligible for SNAP unless they 1) are a refugee, asylee, T-Visa, or Special Immigrant from Iraq/Afghanistan, 2) are under 18, 3) are over 18 and receiving Medical Assistance for a disability, 4) have 40 countable quarters of work history in the US, or 5) are in the military/veteran or the family member of a military member/veteran.



Eligible immigration statuses under OBBA

- **Cuban/Haitian entrants.** Many people from Cuba and Haiti are Cuban/Haitian entrants.
 - A Cuban/Haitian entrant: 1) was granted parole to enter the U.S., even if the parole is now expired or they now have another immigration status, or 2) has a pending asylum application or 3) is in removal proceedings but does not have a final, enforceable order of removal.
 - Cuban/Haitian entrants are exempt from the SNAP five-year bar.
- Compact of Free Association citizens from the Marshall Islands, Micronesia, and Palau (COFA migrants). There are very few COFA migrants in PA.



OBBB Eligible Immigration Status Changes

All SNAP access is lost	SNAP access remains <u>ONLY IF</u> LPR	SNAP access remains, and so does the five-year bar
Withholding of removal	Refugees	Lawful permanent residents (green card holders). Five-year bar rules remain the same. Some LPRs are subject to the five-year bar while others are exempt.
Parolees	Asylees	Cuban/Haitian Entrants. Exempt from five-year bar.
	VAWA petitioners	COFA migrants. Exempt from five-year bar
	T-Visa	
	Special Immigrants from Iraq/Afghanistan	





Summary

Takeaways

- Work requirements (avg. 20 h/week) for adults 18-55 without children start **Sept. 1** statewide
- New immigrant restrictions will start **Oct. 1**
 - Refugees, asylees + others cannot get SNAP unless they also have green cards
- Work requirements for adults 55-64 and households with children 14-17 will start **Nov. 1**
 - At next renewal for current recipients
 - At application for new applicants



Spread the Word:

1. Check if they are **exempt** - complete DHS screening questionnaire
 - On CLS's web site, clsphila.org/SNAPchanges
2. For people with health conditions - get **medical exemption form signed**
3. If **not complying**, benefits will be **time-limited** and will end after 3 months
 - Will not be able to receive SNAP until Jan. 2027 unless exempt or complying.



Spread the Word:

4. Immigrants with green cards should report that they have their green cards to the CAO and provide copies if they can.
5. People subject to the time limit and immigrants should also keep an eye out for notices of SNAP termination and appeal quickly if they want to challenge the termination.

The CAO is likely to get these complicated rule changes wrong in at least some cases. Appeals are the best and fastest way to fix these mistakes.



Questions?

