

FAQs from Community Partner Town Halls

1. Who can we contact for additional information?

Individuals who receive SNAP can reach out to the Oregon Department of Human Services (ODHS) by:

- Logging into their Applicant Portal (AP) account: <https://one.oregon.gov/>
- Visiting a local ODHS Self-Sufficiency Program Office
 - A list of local offices is available on our website at: <http://www.oregon.gov/DHS/Offices/Pages/Self-Sufficiency.aspx>
 - Calling 2-1-1 or visiting <https://www.211info.org/>
 - Calling the following customer service number at 1-800-699-9075

Community partners can e-mail questions regarding the SNAP E&T program and Workfare to: SNAP.EmploymentandTraining@odhsoha.oregon.gov

2. The Third category of exemptions is based on counties, does that mean these counties are exempt from ABAWD time limits? For example, Harney is in yellow.

No, the SNAP time limits are being applied in both green and yellow areas. Persons living in all these counties will be notified of the SNAP time limits. The difference is that yellow counties represent counties where ODHS is going to use Discretionary Exemptions to prevent people from losing their SNAP benefits when they do not meet a regular exemption. In these areas the Oregon Employment Department will not be offering ABAWD program services. OED will continue to offer non-ABAWD services in ALL areas.

3. How does a community-based organization offer opportunities?

As a community-based organization, you can help people understand the time limits and can provide them with additional resources. Also, if you provide wrap around services focused on employment and over-coming health barriers, many of your participants may be exempt from the time limits. “Wrap-around services” means a range of services provided by a Community Based Organization (CBO) addressing a participant’s needs which include medical or health issues preventing a participant from obtaining or maintaining employment. If this applies to your organization let the person know to contact ODHS to seek an exemption from the time limits.

4. Can you please describe the 3-month 3 year?

SNAP participants who are determined to have an Able-bodied adult without dependents (ABAWD) status, they can get SNAP for three months in a three-year period if they do not meet certain work requirements. This is called the SNAP time limit. Once the three-year period ends, the clock is reset, and individuals subject to the SNAP time limit get another three months of SNAP. Oregon’s three-year period began 1/1/2022 and ends 12/31/2024. After 12/31/2024 those who became ineligible because they received three countable months will be eligible for SNAP again.

5. Can the work requirements be met via college classes/hours spent studying? (Separately from the exemption for students who are enrolled 50% or more)

Yes, if a student is not enrolled at least half time, then the hours they are in school can be incorporated into their OED ABAWD case plan. If they are students at least half time they are exempt.

6. How is bartering documented as evidence for meeting required 80 hours of work per month?

A SNAP participant with an ABAWD status who is asked to provide documentation about their bartering activities may, for example, ask for a letter outlining what is being bartered, the hours and the expected end date from the person with whom they are doing the bartering.

7. Does any training in Oregon ETPL (Eligible Training Provider List) list will qualify for exemption? or shall that be training with community college/ vocational school? If a community partner can verify for a training that may not be in DHS's list will the participant be able to keep their exemption?

If a person is attending school at least half time they could be exempt. If they are not enrolled in school half time, activities that they are doing could be incorporated into their OED ABAWD case plan if appropriate. This includes participating in training programs.

8. If a participant is reporting volunteer work, are we verifying this with employer or taking customers word?

Work related activities, including volunteer work, must be verified by ODHS as part of an individual's OED ABAWD case plan.

9. Can self-attestation be accepted if the participant is unable to produce documentation?

For most exemptions, self-attestation is accepted. For work related activities (paid/unpaid) verification is required. Please refer to the handout for additional information.

10. Will ODHS and OED have separate case plans or be working together on one comprehensive plan?

The ABAWD case plans will be held in iMatchSkills™ which is accessible by both ODHS and OED staff. The case plan will be started by ODHS staff, and then followed up by OED Staff (BES). We will be cooperating on a single plan.

11. Will the local ODHS office have staff dedicated to assist with the ABAWD program?

Yes, ODHS is creating a dedicated unit who will focus on supporting the ABAWD program.

12. Do you have a 1 sheet on the Workfare program and application process? Something I can share with my team and executive leadership? How often do sites have to apply? Annually or other?

Community Based Organizations must apply every federal fiscal year (October 1-September 30th) to be a Workfare site. Please use the Workfare Site application provided in the presentation.

13. If someone is reporting they are working, do they need to be on the employer's record?

If the individual reports they are working, they need to provide verification of their working hours to ODHS. This can be by providing a paystub or a letter from their employer.

14. Does the workfare assignment have to result in employment outcome at the site?

The goal of workfare is to provide individuals with opportunities to enhance their employment skills but the Workfare assignments do not have to result in employment outcome at the site.

15. Can a cannabis business be a worksite?

No, a cannabis business is not eligible to become a Workfare site due to federal restrictions. However, earnings from employment at a cannabis business can be used to meet a work-related exemption for working 30 hours or earning at least \$935.25 a month.

16. How many times can an ABAWD customer participate in an OJT opportunity? Is there a limit per PY?

A SNAP participant with an ABAWD status can participate in an On-the-Job training opportunity for six months in a twelve-month period.

17. If the public health emergency gets extended, when would ABAWDS begin to be subject to the time limits?

Oregon is not applying SNAP time limits at this time because of the public health emergency declaration and the Statewide waiver set to expire at end of year. Only one is needed to suspend SNAP time limits. Once the statewide waiver expires, the application of SNAP time limits will be based on the PHE declaration. If the PHE declaration gets extended, Oregon will be required to apply SNAP time limits 2 months after the PHE ends.

18. Are there any plans to do PSAs on the radio?

ODHS is working on a communication plan. This will include a press release and social media announcements. It will become activated once the PHE declaration end date is confirmed. In addition, individuals who are directly impacted by the SNAP time limits will receive notices in the mail during the months of September 2022 and November 2022.

19. If a person completes the 80-hour requirement, will benefits be applied that same month or the following one?

For persons who have not used their three months, SNAP benefits are issued first before a person is known to have completed the 80 hours. If benefits are issued and a person does not meet the 80 hours, they will receive a countable month. After receiving three countable months, SNAP benefits will end. For persons who have received three countable months and their benefits were closed, they have to complete 80 hours in a 30 day period before their benefits are reopened.

20. Do the counting months have to be consecutive?

No, the initial three countable months are issued only when the 80 hours of work-related activities are not completed. They do not have to be consecutive.

21. How will counting months be tracked?

The ODHS ONE system will keep track of exemptions, compliance with the work requirements and the counting months. That is why it is important that people report any exemptions they may be eligible for or work activities. It will issue automatic notices when a person receives a countable month. In addition, OED's iMatchSkills™ system will report information to the ONE system letting it know if a person has met the requirements for work activities assigned in their ABAWD case plan.

22. Are there special rules for unaccompanied minors with their own SNAP case?

The SNAP time limit rules do not apply to individuals who are under the age of 18.

23. How were the decisions for the ABAWD requirements made across each county?

ABAWD Waivers are based on unemployment rates and availability of jobs. Based on current data, only three counties and five reservations are still eligible for waivers in Oregon starting January 1, 2023. All other counties are required to apply time limits. Discretionary exemptions were applied to the counties who were determined to either have no local WorkSource center, considered extreme-rural or have limited access to employment services.

24. Do people need to report each month to continue the exemption?

Regular exemptions last the duration of an individual's SNAP certification period. There is no limit to the number of times regular exemptions can be used. Discretionary exemptions, however, do need to be added manually and tracked by ODHS to ensure they do not exceed the number allocated by the Food and Nutrition Service. Their overuse will result in a financial penalty for ODHS and suspend future allocation of additional discretionary exemptions.

25. What is the limit of hours for people at the Workfare site?

Workfare hours are calculated by taking a person's SNAP allotment divided by minimum wage in the area they reside. Due to Fair Labor Standards Act (FLSA) a workfare site is not allowed to assign more hours than that calculated by ODHS staff using this formula. This often results in an average of 20 hours per month.

26. How long will it take to process a Workfare site application (until a decision is made)?

Once a Workfare site application is completed and submitted to SNAP.EmploymentandTraining@odhs.oregon.gov, it will be reviewed and approved by the SSP E&T team. Upon receiving an approval, the Workfare provider may begin to set up their program.

27. What proof or verification will an ABAWD need to provide to ODHS if they are disabled or pregnant?

ODHS will accept verbal statements or self-attestation for health issues. Questions may be asked to clarify how a person meets the health exemption. Verification may be requested in some situations. Please see the handout for addition information on exemptions.

28. Can you clarify the rules for folks who are self-employed? What type of verification would a self-employed person provide to show that they are working at least 80 hrs/month?

Self-employment hours are based on an individual's calculated monthly earnings. SNAP participants with an ABAWD status who are self-employed and earning at least \$935.25 a month without business costs and \$1870.50 with business costs meet a work-related exemption. Verification for self-employment includes but is not limited to copies of earning statements or income tax records.

29. If a person is on social security, do they need to apply for an exemption?

Anyone who believes they meet an exemption needs to communicate that to ODHS. Exemptions will be documented on a person's SNAP case to prevent them from losing their SNAP benefits. ODHS will be sending individual notices to persons impacted by the SNAP time limits who are not exempt or not known to be doing work activities.

30. Could you please clarify what " In a program" means when speaking of recovery programs? Does one have to be an in-patient, or does out-patient qualify as well?

Enrollment in either type of alcohol/drug treatment program, inpatient and outpatient, qualify for this exemption. Attending Alcoholics Anonymous (AA) and/or Narcotics Anonymous (NA), however, do not. Those attending AA/NA may qualify for other exemptions related to ongoing health issues. ODHS staff will carefully screen for any of the allowable exemptions based on a conversation with the individual.

31. How would you verify that they are enrolled? OAR CFR42 part 2 has strict confidentiality rules

There are some exemptions that we take a verbal statement or self-attestation. When we exempt for health reasons, we do not need verification and do not document specific diagnosis.

32. How do you foresee SNAP time limits impacting individuals who are houseless who are getting SNAP benefits?

Houselessness by itself cannot be used to exempt individuals from the SNAP time limit. However, ODHS staff will carefully screen for any of the allowable exemptions based on a conversation with the individual. Those who are not exempt, will have access to a case manager that will help them create a case plan at OED.

34. If someone is houseless, would participating in services to pursue housing count as work activities?

Only work or work related activities may be counted. ODHS staff will review any activities being done to see if credit can be given. If credit is given, the individual will be referred to OED to complete the remaining hours needed to reach 80 hours.

35. Why are rural areas and metro areas in a county lumped together?

The Food and Nutrition Service has instructed state agencies to use discretionary exemptions based on geographic areas as a best practice. This facilitates tracking their use and ensuring that they are used

equitably in those selected areas. However, the limited number available prevents their use in ALL rural areas.

36. If someone has 3 counting months and is no longer eligible but starts participating, are they now eligible as long as they continue participate?

Correct, to continue to receive SNAP benefits they must continue to participate.

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Program information may be made available in languages other than English. Persons with disabilities who require alternative means of communication to obtain program information (e.g., Braille, large print, audiotope, American Sign Language), should contact the agency (state or local) where they applied for benefits. Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339.

To file a program discrimination complaint, a Complainant should complete a Form AD-3027, USDA Program Discrimination Complaint Form which can be obtained online

at: <https://www.usda.gov/sites/default/files/documents/USDA-OASCR%20P-Complaint-Form-0508-0002-508-11-28-17Fax2Mail.pdf>, from any USDA office, by calling (833) 620-1071, or by writing a letter addressed to USDA. The letter must contain the complainant's name, address, telephone number, and a written description of the alleged discriminatory action in sufficient detail to inform the Assistant Secretary for Civil Rights (ASCR) about the nature and date of an alleged civil rights violation. The completed AD-3027 form or letter must be submitted to:

- 1. Mail: Food and Nutrition Service, USDA 1320 Braddock Place, Room 334 Alexandria, VA 22314; or*
- 2. fax: (833) 256-1665 or (202) 690-7442; or*
- 3. email: FNSCIVILRIGHTSCOMPLAINTS@usda.gov*

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