

June 20, 2025

**GENERAL LETTER NO. 7-C-126**

ISSUED BY: Bureau of Financial, Food, and Work Supports  
Division of Community Access and Eligibility

SUBJECT: Employees' Manual, Title 7, Chapter C, **Nonfinancial Eligibility**, Contents 1 and 2, 26 and 27-29, 30, and 31, revised.

**Summary**

This chapter is revised to

- Remove the requirement to attempt to contact a household at Desk RRED to verbally explain work requirements
- Update screening and longest exemption information to MWR
- Updated acting on changes for MWR

**Effective Date**

Upon receipt.

**Material Superseded**

Remove the following pages from Employees' Manual, Title 7, Chapter C, and destroy them:

<b>Page</b>	<b>Date</b>
Contents 1 and 2	September 27, 2024
26 and 27-29	September 27, 2024
30	December 6, 2024
31	September 27, 2024

**Additional Information**

Refer questions about this general letter to your eligibility determinations manager.

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4. To determine eligibility in comparison to the net income eligibility standard, use deductions for the month of application the same as for any other household member. Whether you are using the striker's pre-strike earnings or current income, allow the earnings deduction if appropriate. Approve the application if the household is eligible.

When the striker returns to work and the household remains eligible, continue to use this calculation until full regular paychecks are received and considered.

## **Work Registration**

Legal reference: 7 CFR 273.7(j)

**Policy:** SNAP applicants and recipients are mandatory work registrants unless they qualify for an exemption listed under [Exemptions From Work Registration](#). A mandatory work registrant (MWR) is required to meet the work requirements listed under [Work Requirements for MWRs](#) to be eligible for SNAP benefits.

**Procedure:** Determine the work registration status of:

- Each household member at application and recertification.
- A new member who is joining an ongoing household. See [Changing from Exempt to MWR](#) for when a new member must be registered for work.
- Members of a certified household when a change in household circumstances may also change the work registration status of the members. See [Changing from Exempt to MWR](#) and [Changing from MWR to Exempt](#) for instructions.

When determining work registration status, all individuals must be screened for all possible exemptions from work registration. The exemption that would be effective for the longest period of time must be applied.

Enter the work registration status of each household member on the ABC system each time it is determined. Use the following codes to enter the person's status in the TD03 WR field:

- 3 Mandatory work registrant, not an able-bodied adult without dependents (ABAWD)
- 4 FIP recipient
- 9 Exempt from work registration and ABAWD work requirements
- E Potential ABAWD, only exempt from MWR and ABAWD due to earnings
- F Central Office use only
- L Mandatory work registrant and ABAWD who is not meeting the work requirement
- V Mandatory work registrant and ABAWD who meets the work requirement

### **Exemptions from Work Registration**

Legal reference: 7 CFR 273.7(b), 441 IAC 65.28(2)(a-h)

**Policy:** A person is exempt from mandatory work registration if the person is:

- Under age 16.
- Aged 16 or 17 and is not the head of the household. The head of household is the person that shows on ABC as the case name.
- Aged 60 years or older.
- Physically or mentally unfit for work. The person's condition can be either temporary or permanent. If the person's disability is not readily apparent, you may ask for verification. Verification can include proof such as:
  - A statement from a licensed health care professional, or
  - Proof that the person is receiving temporary or permanent disability benefits from the government or a private source.
- A FIP recipient or a refugee receiving Refugee Cash Assistance (RCA).
- Caring for a dependent child under age six or an incapacitated person. The person must agree to register for work as part of the next scheduled recertification after the child's sixth birthday, unless another exemption applies. The child or incapacitated person doesn't have to be in the client's SNAP household or live with the client for the client to be eligible for this exemption. However, the client cannot be exempt for caring for a child under six or an incapacitated person as part of their job (their work hours or earnings may qualify them for an exemption; see below).

More than one person cannot claim responsibility for the care of the same child. If there are two or more children in a household, each adult can claim the responsibility for the care of different children. For example, in a household with two adults and two children, both adults can be exempt if they each claim responsibility for the care of a different child.

- Receiving job insurance benefits (JIB) or registered for work as part of the JIB application process (unemployment compensation).

NOTE: This exemption does not apply to union members who are laid off and expect to be recalled, because they are **not** required to register for work when they apply for JIB. Once they start to receive JIB benefits, union members are exempt from work registration.

- Working for pay at least 30 hours per week or receiving gross weekly earnings at least equal to the federal minimum wage multiplied by 30 hours. Effective July 24, 2009, the federal minimum wage rate is \$7.25 per hour.

When hours of work fluctuate, average the hours for a period of time that allows a reasonable estimate of the hours expected to be worked per week. Working for an in-kind benefit, such as working off rent, does not provide an exemption from work registration.

- Working at self-employment and receiving net earnings at least equal to the federal minimum wage multiplied by 30 hours.
- Working at self-employment for at least 30 hours per week, regardless of the amount of money earned. A statement from the person is sufficient documentation of hours of work. Home-schooling a child at least 30 hours a week is considered self-employment for the purpose of this exemption.
- A migrant and seasonal farm worker who is under contract or similar agreement with an employer or crew chief to start work within 30 days.
- Participating in a drug addiction or alcoholic treatment rehabilitation program. Participation can be either as a resident of the center or on an outpatient basis.
- An applicant for both SSI and SNAP who filed a joint application at the Social Security office. If the person filed for SSI, but applied for SNAP separately at HHS, do not use this exemption. Instead, determine if the exemption for “physically or mentally unfit for work” applies.

This exemption continues while the person is waiting for a decision about SSI eligibility. “Waiting for a decision” does not include the period of time during which a person is appealing a denial of the SSI application.

If the person becomes eligible for SSI, the exemption continues as long as the person continues to be eligible for SSI. If the Social Security Administration finds that person is **not** eligible for SSI, the exemption ends. This includes a person who is appealing a denial.

A person who is found ineligible for SSI still may be exempt from work registration under the exemption for being “physically or mentally unfit for work.” Determine if the person meets this exemption or a different exemption status within two months of notification of ineligibility for SSI.

- A person enrolled at least half-time in any recognized school, training program, or institution of higher education. Students enrolled at least half-time in an institution of higher education must meet the student eligibility requirements in [7-1](#).

This exemption continues during all school terms, vacations, and breaks when the student intends to register for at least half time for the next school term. The exemption ends when the person:

- Graduates.
- Is suspended.
- Is expelled.

- Drops out.
- Has completed a regular school term and does not intend to register for the next normal school term.

1. Travis is an 18 year old full-time high school student. He is not subject to student requirements (see [7-I](#)). Because Travis is enrolled at least half-time in high school, he is exempt from MWR and therefore exempt from ABAWD work requirements.
2. Taylor attends a CDL program through DMACC. She attends this program half-time. A person enrolled in an occupational training program is not considered to be enrolled in an institution of higher education and therefore is not subject to student requirements (see [7-I](#)). Because Taylor is enrolled half-time in this training program, she is exempt from MWR and therefore exempt from the ABAWD work requirements.
3. Bey is full-time college student at the University of Iowa and taking credit classes working toward an undergraduate degree. Bey is subject to student eligibility requirements in [7-I](#) and is only exempt from MWR if she meets the student eligibility requirements.

### **Work Registration Process**

Legal reference: 7 CFR 273.7(c), 7 CFR 273.7(c)(1)(ii)

**Policy:** By signing the application or recertification form, a SNAP applicant or recipient is considered to be registered for work. However, work requirements apply only to mandatory work registrants (MWRs) in the household.

**Procedure:** Explain at the interview:

- What work requirements are,
- The rights and responsibilities of MWRs, and
- The penalties for failing to comply with [Work Requirements for MWRs](#).

Form **470-5674** or **470-5674(S)**, **SNAP Work Rules** will automatically be sent to the household. Document that the form was given to the household and that you verbally explained the work requirements to the household. The oral explanation of work requirements can be found in the WISE narrative template link.

For desk RREDs, there's no requirement to verbally explain their work requirements. The **SNAP Work Rules** form will automatically be mailed to household based on the WR coding in the system. See [Changing from Exempt to MWR](#) for the process to register new MWR members who join certified households.

The work registration status of a household member may change during the certification period. When a change is reported that may affect mandatory work registration status of a household member, begin by following the policies in 7-G for acting on changes to determine whether the reported change requires immediate action.

If the change requires action, see the policies [Changing From Exempt to MWR](#) and [Changing From MWR to Exempt](#). These policies provide the process to change the mandatory work registration status of certified household members. If the change doesn't require action based on the household's reporting requirements, hold the information and take appropriate action at the next recertification.

### **Changing From Exempt to MWR**

Legal reference: 7 CFR 273.7(b), 7 CFR 273.7(c)(1)(ii)

When a household reports a change in circumstances that results in a member losing an exemption from mandatory work registration or when a new member joining the household is subject to work rules, the system automatically mails form **470-5674** or **470-5674(S)**, **SNAP Work Rules**, to the individual. If issuing a manual NOD, give or mail form **470-5674** or **470-5674(S)**, **SNAP Work Rules**, right away to the person who is subject to the work rules. You must also provide a verbal explanation of the work requirements to the member who lost the exemption or the new household member subject to the work requirements as noted above. This includes when a person's status changes from MWR exempt to ABAWD or potential ABAWD. See [7-I, ABAWD Status Notification](#).

Make the system entry to show the person's mandatory work registration status.

### **Changing From MWR to Exempt**

Legal reference: 441 IAC 65.28(5)

When a change is reported during the household's certification period that indicates a person has become exempt from work registration, act on the change.

- If verification is **not** necessary in order to allow the exemption, make the system entry right away to change the person to exempt.
- If verification **is** necessary to allow the exemption, give the household 10 days to verify the circumstances keep the person coded on the system as an MWR until the verification is returned. Make the system entries to show the person's exempt status when you receive the verification.

Do not cancel a person for the sole reason that the person fails to verify an exemption from work registration. If this happens, keep the person coded as an MWR on the system until you receive verification.



If a work requirement violation happens while the person is coded as an MWR, be sure to give the person another opportunity to verify the claimed exemption, if necessary to avoid disqualification.

### **Work Requirements for MWRs**

Legal reference: 7 CFR 273.7(a), 441 IAC 65.28(6), 65.27(234)

**Policy:** Unless they have good cause to not do so, to be eligible for SNAP benefits MWRs must:

- Not voluntarily quit a job that provides at least 30 hours of work weekly.
- Work at least 30 hours a week if their employer offers at least 30 hours a week.

**Procedure:** See [Voluntary Quit](#) to determine if a job loss is a voluntary quit. See [Reduction in Work Effort](#) to determine if a reduction in work effort has happened.

### **Verifying a Claim of Good Cause for Not Complying**

Legal reference: 7 CFR 273.7(i)(3) and 273.7(i)(4), 441 IAC 65.28(17), 65.28(12), and 65.27(234)

**Policy:** Do not disqualify an MWR for committing a work requirement violation when the person has good cause for not complying. A person has good cause for not complying when:

- There were circumstances beyond the person's control. Examples include the person's illness, illness of another household member requiring the person's presence, a household emergency, the lack of transportation, or the lack of adequate child care for children ages 6 through 11. The household determines if adequate child care or transportation is available.
- The job was unsuitable. See [Determining if Employment Is Suitable](#) for reasons that make a job unsuitable.
- The employment became unsuitable after the person accepted the job. See [Determining if Employment Is Suitable](#) to determine if the job was unsuitable.
- There was discrimination by an employer based on age, race, sex, color, handicap, religious beliefs, national origin, or political beliefs.
- The work demands or conditions make it unreasonable to continue employment, such as working without being paid on schedule.
- A person leaves employment to accept another job or enroll at least half time in a recognized school, training program, or institution of higher education.
- A person leaves employment because another household member accepted a job or enrolled at least half time in a recognized school, training program, or institution of higher education in another county or state, causing the household to move.