

June 20, 2025

GENERAL LETTER NO. 7-I-53

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

SUBJECT: Employees' Manual, Title 7, Chapter I, **SNAP Specific Households and Participants**, Contents 1-3, pages 30 and 31, 33, 34-39, 40-42, revised.

Summary

This chapter is revised to

- Update definition of ABAWD exempt groups
- Update flow chart
- Update changes in ABAWD status

Effective Date

Upon receipt.

Material Superseded

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

Page	Date
Contents 1-3	December 6, 2024
30 and 31, 33	May 9, 2025
34-39	December 6, 2024
40-42	September 27, 2024

Additional Information

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

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An ABAWD can get only three months of SNAP benefits while not meeting the ABAWD work requirement. (See [Time Limit for ABAWDs](#).) After using the three months, some ABAWDs can get an additional three months if they meet the conditions under [Additional Three-Months' Eligibility](#).

ABAWD Exemptions

A person is exempt from the ABAWD work requirements if the person is:

- Exempt from mandatory work registration (MWR) for any reason. See [7-C, Exemptions from Work Registration](#) for a list of exemptions.
- Under age 18. This includes the month in which a person turns 18.
- Aged 55 or over. This includes the month in which a person turns 55. Note: the change to 55 was effective 10/1/24.
- Pregnant. This applies to any trimester.
- Unfit either mentally or physically for employment (has a condition that makes the person unemployable or that prevents the person from keeping a job).
- Experiencing homelessness:

An individual who lacks fixed regular shelter, or who will imminently lose their nighttime residence, or whose primary shelter meets certain conditions, such as congregate shelters, halfway houses, and temporary accommodations for up to 90 days with another individual.

- Under age 25 and aged out of foster care:

Individuals who were in foster care on their 18th birthday or later, regardless if the individual remained in extended foster care until the maximum age or left extended foster care before the maximum age. Foster care includes extended foster care programs and foster care programs run by District, Territory, Indian Tribal Organizations, or Unaccompanied Refugee Minors Program. This applies to foster care in any state, the individual did not need to be in foster care in Iowa to receive this exemption.

- A veteran:

An individual who served in, and was discharged from, the Armed Forces, including the reserves. Armed Forces include: Army, Marine Corps, Navy, Air Force, Space Force, Coast Guard, and National Guard. The individual's discharge status is irrelevant. This also includes individuals who served as commissioned officers of the Public Health Service, Environmental Scientific Services Administration, or the National Oceanic and Atmospheric Administration.

- A member of a SNAP household that includes a child under the age of 18.

NOTE: This also applies when a child is in the home, but is ineligible for non-financial reasons, like not providing an SSN or having an ineligible alien status.

When parents have shared or joint custody, and both parents have SNAP cases, only the SNAP household where the child receives SNAP benefits can be exempt from the ABAWD work requirements due to having a child under age 18 in the household. The exemption cannot apply to the other parent's SNAP household. In the rare instance when a household can choose to include or exclude the child, and the household chooses to exclude the child, the household loses the opportunity to exercise this exemption because the exemption follows the child.

If an exemption applies for at least one day in a month, the ABAWD is exempt for the entire month.

Determine a person's "fitness" for employment using the prudent-person principle or any reasonable evidence that supports your decision. The person's condition does not need to be permanent for a determination of "unfitness" to be made. Households that are chronically homeless, as defined by the worker, are considered unfit for employment.

Your own observation of the person or information obtained in conversation with the person is a sufficient basis to make a determination as to a person's fitness for employment. In the rare occasion that you find it questionable that a person has a mental or physical limitation that would make the person unfit for employment, you may ask for verification.

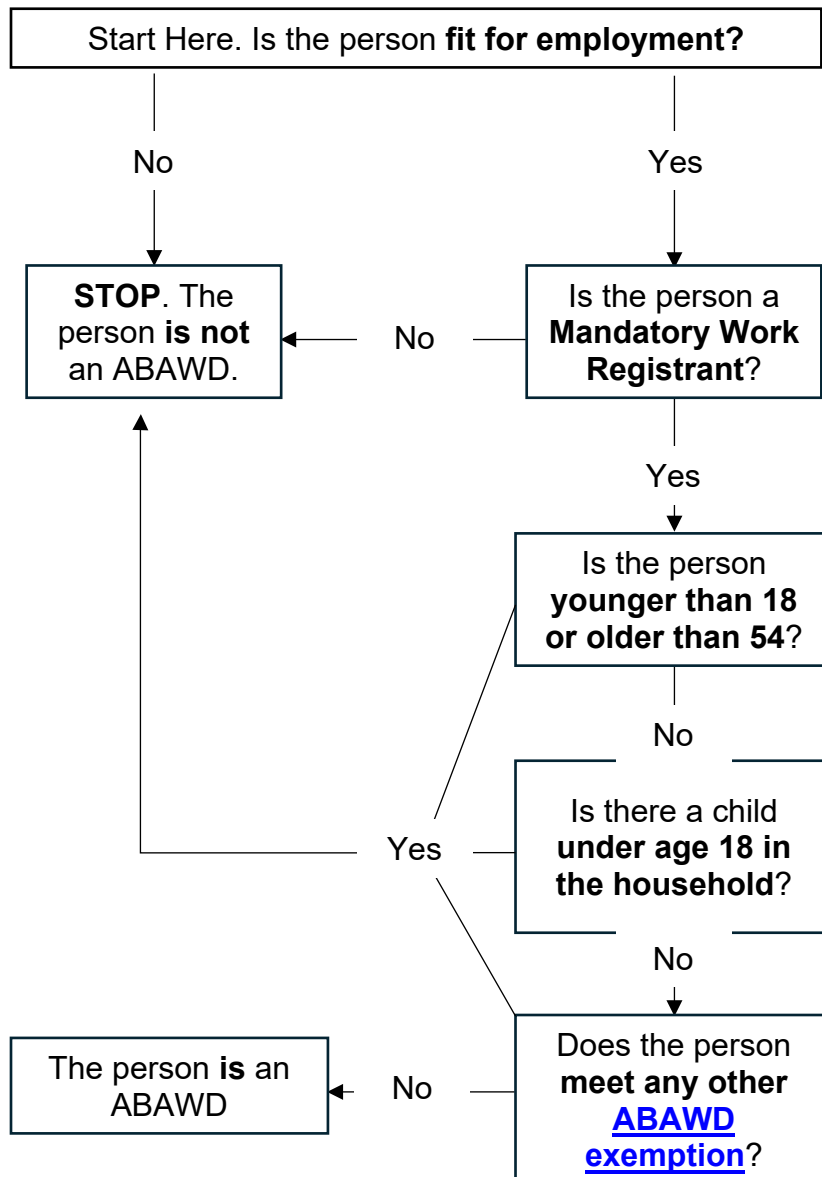
Because people who have no source of income or insurance are often not able to receive medical care or substance abuse or mental health treatment, you may need to identify these conditions. If a person is in treatment, you can get a statement from the person's health-care professional or a social worker.

If the person does not have the means to pay for or obtain a professional diagnosis, other evidence may be used. A prudent person can often identify these types of issues without the need for verification. For example, statements from former employers or other persons who know the person's situation can be sufficient evidence of the person's mental or physical limitations.

When your judgment is the only basis for determining that a person is not "fit" for employment, you must document it as such in the person's case record.

GUIDANCE: The following scenarios illustrate circumstances that would lead to the determination that a person is unfit for employment.

1. During the application interview, you discover that the person has had many jobs but repeatedly lost them. Through your conversation, you discover the person has a history of getting fired quickly or quitting due to uncontrollable outbursts of anger with the employer or coworkers. This may be an untreated mental health issue that currently makes the person mentally unfit for employment. Document worker determination that the person is physically or mentally unfit due to anger issues explained by the client.
2. While interviewing a person, you discover he has been in and out of various substance abuse treatment programs for several months. Even if he is not currently in a program, these circumstances and issues make him physically or mentally unfit for employment and must be documented in the case file.

Flow chart to determine if a person is an ABAWD:**Changes in ABAWD Status**

Changes in circumstances can cause a person's status as an ABAWD to change back and forth. During periods in which a person is not an ABAWD, the work requirements for ABAWDs and time limits for receipt of SNAP benefits do not apply. During the periods in which the person is determined to be an ABAWD, the work requirement for ABAWDs and time limits do apply.

If a person who previously qualified for an ABAWD exemption loses that status, you must determine if they qualify for any other exemption before applying the time limit. Contact the person to see if they qualify for any other exemption. You cannot penalize the person if they don't respond. Any countable months towards the time limit cannot be assigned until the screening has been completed.

If a person who was determined to be an ABAWD reports a change that would qualify them for an ABAWD exemption you must act on the change.

- If verification is not necessary to allow the exemption, you must stop assigning countable months against the time limit immediately
- If verification is necessary and you are unable to verify using information already available, give the household 10 days to verify the circumstances.

Do not cancel a person for the sole reason that the person fails to verify an exemption from ABAWD status. If this happens, continue to apply the time limit and assign countable months until the exemption is verified.

See [Tracking](#) for instructions on changing ABC system coding when there is a change in an ABAWD's status.

Terry is an ABAWD. He receives two months of SNAP benefits while not fulfilling the work requirement during December 2023 and January 2024. In February 2024, he joins his girlfriend's SNAP household. His girlfriend has a two-year-old child. In February, he is exempt from the ABAWD work requirement because of the child. The child's mother is exempt from the ABAWD work requirement due to her employment.

In April, Terry moves out on his own. In May, he is no longer exempt from ABAWD work requirements. Until November 30, 2026, he is entitled to one more month of SNAP benefits while not fulfilling the work requirements, unless he meets the requirements under the policy on [Additional Three-Months' Eligibility](#) or becomes exempt again.

When a new ABAWD period begins December 1, 2026, Terry is eligible for three months of benefits in the new period.

ABAWD Work Requirement

ABAWDs must perform one of the activities listed below to be eligible for SNAP benefits beyond their time limits. The minimum number of hours required for any of the activities is 80 per month. To be eligible beyond the limits, ABAWDs must be:

- Working a total of 80 or more **actual** hours in a month. Do not use minimum wage criteria to determine the number of hours worked.

- Participating for a total of 80 or more **actual** hours in a month in a qualifying work program. Qualifying work programs include:
 - Programs that are offered under Title I of the Workforce Innovation and Opportunity Act (WIOA) or under Section 236 of the Trade Act of 1974
 - Employment and training programs operated or supervised by a State or political subdivision of a State agency that meet standards approved by the Chief Executive Office, including SNAP E&T programs and programs of employment and training for veterans operated by the Department of Labor or the Department of Veterans Affairs
- Performing any combination of the two work and participation requirements stated above for a total of 80 or more **actual** hours in a month.

ABAWD Status Notifications

All general work and ABAWD work rules must be verbally explained to households with ABAWD or potential ABAWD members at:

- Application
- Recertification
- When a reported change in circumstance results in a member becoming subject to ABAWD work rules
- When a new person moves into the SNAP household and is subject to ABAWD work rules

The system automatically mails form 470-5674 or 470-5674(S), *SNAP Work Rules*, to ABAWDs and potential ABAWDs. 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 ABAWD work rules.

Tracking

The ABAWD's case record must be documented to track the number of months that each ABAWD has used towards the three-month time limit. The Worker Information System Exchange (WISE) User Guide gives instructions for documenting ABAWD months in WISE.

Code the ABC system to show that an ABAWD is or is not meeting the ABAWD work requirement. See [14-B-Appendix](#) for how to code the TD03 screen to show whether a person is an ABAWD who is or is not meeting the work requirement. Correct coding of this entry is important for federal reporting requirements and to be able to identify these clients through a system run when necessary.

Change the code on TD03 whenever an ABAWD's work status changes and when an ABAWD becomes exempt from the ABAWD work requirement. When an ABAWD becomes exempt from the work requirement, use the applicable coding to show the person's work registration/ABAWD status.

Definition of Work

"Work" for the purposes of meeting the ABAWD work requirement means:

- Working in exchange for money. This can be either employment or self-employment.
- Unpaid or volunteer work. This type of work must be performed through an organization (including religious organizations) or be court-ordered community service. One individual performing free labor for another (such as mowing a neighbor's lawn) does not meet the definition of work for this purpose.
- Working in exchange for an in-kind benefit, like working in exchange for rent or any other goods or services.

1. Ms. J works 60 hours a month at a fast-food restaurant. She also works 20 hours a month in exchange for her living accommodations. Ms. J's work activities total 80 hours each month. Ms. J meets the ABAWD work requirement.
2. Mr. L's monthly hours of work vary between 60 and 100. He is not expected to pay rent, but he is expected to perform services for the person he lives with in exchange for the cost of his share of household supplies, like laundry soap and other consumables. He also spends an average of 20 hours monthly performing various odd jobs. Mr. L meets the ABAWD work requirement.
3. Mr. M house-sits for a person who is out of the country on business. By virtue of his job, he gets living accommodations in return for watching over the home. Mr. M meets the ABAWD work requirement.

Good Cause for Not Meeting the Work Requirement

Allow "good cause" when an ABAWD who has been meeting the ABAWD work requirement temporarily does not meet the requirement. To qualify for good cause, the ABAWD must plan to continue to participate in the activity that meets the work requirement after the temporary absence.

Use reasonable judgment when considering granting good cause. Good cause reasons include circumstances beyond the person's control such as, but not limited to:

- A household emergency.
- The unavailability of transportation.
- Illness of the person or another household member requiring the ABAWD's presence.

Document the good cause reason in the ABAWD's case record whenever an ABAWD has good cause for not meeting the work requirement. Months in which good cause is granted do not count towards the three-month limit. If the ABAWD is not meeting the work requirement at the next recertification, you must review their circumstances to determine if good cause still exists.

1. Ms. A meets the work requirement with her job at the grocery store. Ms. A's car breaks down and she does not live in a town with public transportation. She can't get to work and she loses her job. Ms. A states that she is looking for a job closer to home so she can walk to work. Ms. A has good cause for not meeting the work requirement and she plans to continue working. If Ms. A is not meeting the work requirement at her next recertification, the worker must reassess her good cause.
2. Mr. X meets the work requirement with his job at the factory. He loses his job at the factory because he does not meet the production quota. He states he does not plan to look for another job right now. Mr. X does not meet good cause because he does not plan to continue to participate in work, the activity that met the work requirement. Determine Mr. X's countable ABAWD months per normal procedures.

Reporting and Verifying Hours

The actual number of hours an ABAWD works in a month must be reported and verified to ensure that the person is meeting the work requirement. The number of hours actually worked in a calendar month is the determining factor for meeting the ABAWD work requirement, not the hours for which the person was paid in the month.

Use any reasonable means to determine and verify the actual number of hours worked in a calendar month. Use caution if using pay stubs to verify hours of work, because pay periods often overlap calendar months and do not reflect the number of hours actually worked in the month in which the person received the pay.

Accept the word of a self-employed person as verification of how many hours are worked per month. Document the client's statement as to how many hours are worked per month in the case record.

Accept the statement of a person who provides an in-kind benefit in exchange for an ABAWD's services as verification.

Once you have verified the hours of work, it is not necessary to do so each month. Assume that an ABAWD is continuing to work 80 or more hours monthly unless the ABAWD reports that the hours of work have dropped below 80 or you have other information indicating the hours are less than 80.

Time Limit for ABAWDs

Legal reference: 441 IAC 65.28(18)

ABAWDs can get only three months of SNAP benefits while they are not meeting the work requirement.

EXCEPTION: Some ABAWDs can receive an additional three months of eligibility while not fulfilling the work requirement. See [Additional Three-Months' Eligibility](#) for information.

All ABAWDs are eligible for the three-month limit during each three-year period, even if they used benefits under a previous period. This period is the same for all ABAWDs in Iowa. The periods are:

- December 1, 2023, through November 30, 2026
- December 1, 2026, through November 30, 2029

The three-month limit can be used either consecutively or nonconsecutively. A prorated month does not count towards an ABAWD's three-month limit. For the purpose of determining countable ABAWD months, benefits are not considered prorated if a household applies on the first of the month and receives a full month's benefit.

1. Aleah, an ABAWD, applies for SNAP on April 3 and has not used ABAWD months. Assuming she does not start meeting ABAWD requirements or become exempt, Aleah's three ABAWD months will be May, June, and July. April does not count because benefits are prorated from the third of the month.
2. Belinda, an ABAWD, applies for SNAP on May 1 and has not used ABAWD months. Assuming she does not start meeting ABAWD requirements or become exempt, Belinda's three ABAWD months will be May, June, and July. May is countable because, with an effective date of May 1, she will receive a full month's benefit.

When the benefits an ABAWD receives in a month that counts toward the three-month limit are entirely subject to a claim, that month continues to count toward the ABAWD's three-month limit until the entire month's benefits have been repaid.

1. Jalen applies for SNAP benefits during January 2024 and is determined to be an ABAWD. His January SNAP benefits are prorated, so January does not count towards his three-month limit.

He does not meet the work requirement during February, March, or April 2024. Therefore, February, March, and April count towards his three-month limit and he uses up his eligibility in April.

2. Olson has been receiving SNAP for several months with his 17-year-old child. Olson's child moves out in February 2024. Olson is determined to be an ABAWD for the month of March. February does not count towards his three-month limit, because Olson's child lived with him in February.

Olson does not meet the work requirement during March, April, or May and uses up his eligibility in the month of May.

3. Mary has been receiving SNAP for several months with her 17-year-old child. Her child turns 18 in April 2024. Both are determined to be ABAWDs for the month of May.

Mary's child does not meet the work requirement during May, June, or July so those months are countable toward her three-month limit. The child uses up eligibility in the month of July.

Mary does not meet the work requirement during May. She becomes unfit for employment in June. May is a countable month toward her three-month limit. Because she is exempt for at least one day in June, June is not a countable month.

Mary has two months of her three-month limit left. She will not use any more countable months until the month **after** the month in which she loses her exemption from the ABAWD work requirements

She continues to get SNAP benefits as long as she is exempt from ABAWD work requirements or until she loses her exemption and then uses the remaining two months of her three-month limit.

See [Ineligible Household Members](#) for how to treat the income and resources of an ineligible ABAWD who is a member of an eligible SNAP household.

Countable Months in Another State

If an applicant ABAWD received SNAP benefits in another state, verify whether any of the months in which benefits were received were countable months in that state. Also verify whether the additional three months of benefits were used.

The other state's verbal statement is the only proof needed that the ABAWD did or did not use any countable months. Document the information in the case record.

Consider only Iowa's three-year period when determining if the benefits received in the other state count towards Iowa's three-month limit. See [Time Limit for ABAWDs](#) for Iowa's periods in which ABAWDs are limited to three months of benefits.

Regaining Eligibility

ABAWDs who have been canceled or denied SNAP eligibility because of having used their three-month time limit can regain eligibility for SNAP benefits. There is no limit on how many times an ABAWD can regain eligibility.

- ABAWDs can regain eligibility right away by becoming exempt from the ABAWD work requirement, as explained under [ABAWD Exemptions](#).
- ABAWDs can also regain eligibility by performing one of the activities listed under [ABAWD Work Requirement](#) within any 30-consecutive-day period, instead of a calendar month. The activity must be completed before the ABAWD can be approved for SNAP benefits.

ABAWDs who regain eligibility can get SNAP benefits as long as they continue to meet the work requirement or are exempt from the work requirements. ABAWDs who regain eligibility but are not meeting the work requirement when they apply for SNAP benefits may qualify for an additional three months of eligibility, as described under [Additional Three-Months' Eligibility](#).

If an ABAWD applies before having completed an activity under [ABAWD Work Requirement](#), you can deny the application right away or hold the application until the ABAWD work requirement activity has been completed. This is an IM worker decision.

If you hold the application until the activity is met, you still must prorate SNAP benefits from the date of application, not from the date the activity was met.

1. Keegan applies for SNAP benefits on August 5, 2024. His SNAP is canceled effective July 1, 2024 because he has used his three months of benefits.

He gets a job on July 15 and works a total of 60 hours in July and 10 hours in August. He reapplies for SNAP. At the certification interview on August 7, the worker learns that Keegan is scheduled to work another 10 hours before August 15.

The worker decides to hold the application until Keegan provides verification of having worked 80 hours between July 15 and August 14. He meets the criteria to regain eligibility on August 13 and remains eligible for SNAP benefits as long as he keeps working 80 hours each month.
2. Felicia receives her three-month limit of SNAP benefits during August, September, and October 2024, and is canceled effective November 1. In January 2025, she reapplies for SNAP benefits.

She reports that she is working off her rent at 20 hours weekly. She started this arrangement with her landlord on December 1, when her roommate moved out and she could not pay the rent. Felicia provides verification from her landlord.

She met the ABAWD work requirement December 31 and is eligible for SNAP benefits as long as she continues the arrangement.

Additional Three-Months' Eligibility

A one-time additional three months of SNAP eligibility may be allowed to some ABAWDs. The additional three months of eligibility are a consecutive period allowed only once during each three-year period. See [Time Limit for ABAWDs](#) for information about periods in which ABAWDs are limited to three months of benefits.

An ABAWD qualifies to receive additional months only when the ABAWD:

- Has first used all of the “three-month time limit,” **and then**
- Has had a break in receipt of SNAP benefits, **and then**
- Regains eligibility, **and then**
- Stops meeting the ABAWD work requirement.

ABAWDs do not have to apply for SNAP benefits right away after they stop one of the activities listed under [ABAWD Work Requirement](#).

The additional three months are the three months following the month in which an ABAWD reapplies for SNAP benefits. A month of prorated benefits does not count as one of the three months.

Once started, the additional three-month period continues uninterrupted for any reason, including whether or not the ABAWD actually receives SNAP benefits during the time.

Ceasing to Meet the Work Requirement

For purposes of qualifying for the additional three months of benefits, consider an ABAWD to have stopped meeting the ABAWD work requirement when:

- The person's participation in a qualifying work program ends for any reason.
- The person is laid off, quits, or is fired from the job.
- The person permanently reduces hours of work to less than 80 hours monthly.
- The person's employer reduces the person's hours of work to less than 80 hours monthly.

Note: Good cause provisions do not apply.

Use the following flowchart to determine whether an ABAWD is eligible for the additional three months:

