

Supplemental Nutrition Assistance Program (SNAP): Work Requirements in NC

Presented by:

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- Webinar is being recorded
- Presentation will be sent by email to all registrants

Agenda

- Work Registration and Voluntary Quit Rules
- Able Bodied Adult Without Dependents (ABAWD) Rules - including December 2025 Changes
- Resources & Referrals
- Upcoming Webinars
- Questions?

Work Registration and Voluntary Quit (FNS 240)

- Non-exempt individuals ages **16 - 59** must register for work with Employment Security Commission. This happens as part of SNAP interview at application or recertification.
- Once registered, the individual is NOT required to do work search or accept job offer **UNLESS** receiving or applying for unemployment benefits (UIB).

Work Registration and Voluntary Quit Cont. (FNS 240)

- An individual who is not exempt from work registration who voluntarily quits a job or reduces work hours without good cause may be temporarily disqualified from FNS benefits. The disqualification lasts **1 month** if first offense, **3 months** if 2nd offense, **6 months** if 3rd offense. Disqualification ends if person becomes exempt from work registration.
- The state agency could require non-exempt persons to participate in an Employment and Training Program but there is no such program in NC at this time.

Exemptions from Work Registration

- Ages **16 - 17** and not head of SNAP household
- Individual responsible for the care of a child **under age 16**
- Employed or self-employed at a rate of **30** hours per week or earning minimum wage times **30** hours
- Physically or mentally unfit for work OR in drug/alcohol treatment
- Caring for an "**incapacitated person**," i.e. an individual who, due to a physical, cognitive, developmental, or behavioral condition, cannot independently perform basic activities of daily living OR requires ongoing supervision or support to maintain personal safety or functioning
- Enrolled at least **half time** in school, training, or higher education
- Self-attestation **MUST** be accepted unless questionable (i.e., inconsistent with other verified information)

ABAWD Rule (FNS 260)

- **ABAWD:** Able-bodied Adults Without Dependents are required to work to receive SNAP benefits. While ABAWD and Work Registration policies are related to each other, each is applied independently.
- **ABAWD:** An individual age **18 - 64** NOT living with at least one child under age 14.
 - The individual does NOT need to be the parent or responsible for the child under **14** to be exempt from ABAWD.
 - The child does NOT need to be member of the FNS household (e.g., a noncitizen child).

Complying with ABAWD Rule

Any combination of the following - totaling **80** hours per month:

- Paid work regardless of amount of earnings;
- Self-employment regardless of whether making a profit;
- Work in exchange for in-kind benefit (e.g., bartering or working in return for a place to stay);
- Volunteer unpaid work for church, charity, government agency or any community organization or court ordered community service;
- Participation in a structured voluntary work program (which may include some job search).

ABAWD 3-Month Limit and 36-Month Clock

- Non-exempt beneficiaries who DO NOT comply with ABAWD rule or have good cause are limited to **3** months of SNAP benefits during a **36**-month period.
- Months of compliance or exemption don't count toward **3** months.
- Other members of the FNS HH remain eligible after **3**-month limit ends.
- NC uses a fixed **36**-month period. Current period is from **1/1/25** through **12/31/27**.
- Non-compliant, non-exempt ABAWDs will get a new **3** months of eligibility beginning **1/1/28** but **MUST** reapply.
- Prorated months of benefits (applied mid-month) **CANNOT** be counted toward **3**-month limit.

Regaining Eligibility and Bonus Months

- If eligibility is lost due to ABAWD, individual regains eligibility after:
 - **30** days of compliance, or
 - becoming exempt, or
 - **36**-month clock expires.
- If regain eligibility during **36**-month period, also eligible for additional 3 consecutive months of bonus eligibility despite again being noncompliant after one month of compliance.

12/1/25 ABAWD Changes

- Age range of those subject to ABAWD increased by the One Big Beautiful Bill Act (OBBBA) to include **ages 55 through 64**. This includes those **over 60** who are excluded from Work Registration.
- Parents and other adults living with children **aged 14 and older but no younger children** are now subject to ABAWD.
- Veterans and Former Foster Youth no longer exempt.
NOTE: Veterans who receive U.S. Department of Veterans Affairs (VA) Disability Compensation are still unfit for work regardless of disability rating percentage.

12/1/25 ABAWD Changes

- Federal exemption for all homeless eliminated.
- However, the **chronically homeless** are exempt.
- Chronically homeless include those living on street, in car, in shelter, or in a place clearly unsuitable for habitation (eg no bathroom).
- No minimum period of time being homeless is required to qualify as chronically homeless.
- Practical effect: only couch surfers now subject to ABAWD.

Implementation of 12/1/25 ABAWD Changes

- **New rules cannot be applied until after DSS interview** (at time of application or recertification) **occurring after December 1, 2025.**
- Countable months based on these changes cannot be applied retroactive to the date of that interview.
- DSS interview must include thorough screening for all exemptions and explain all means of compliance.

ABAWD Exemption: Unfit for Work

- Unfitness can be temporary and is MUCH more liberal than the SSA standard.
- This exemption must be given **without asking for medical documentation** if obvious. This includes:
 - Individual reports recent hospitalization or serious mental illness
 - Over age **55** with limited education, no recent work history, and a “severe” impairment
 - Chronic homelessness
 - Victim of ongoing or recent domestic violence, sexual harassment, or sexual assault
 - Pregnant individuals
 - Alcohol or drug dependence (even if not in treatment)
- DSS must accept applicant statement unless questionable
 - If medical documentation is required, who can provide it has been expanded

New ABAWD Exemption: American Indians

- Effective **November 1st, 2025**
- Definition is complex but includes members of recognized Indian tribes and Urban Indians (those living in communities with enough of an Indian or Indian-decedent population). See [FNS 260](#) pp. 15-16.
- DSS must screen for this at application and recertification interviews starting **11/1/25**.
 - Must accept applicant statement unless questionable

Other ABAWD Exemptions

- Caring for an “*incapacitated person*” (see work registration exemption)
- Parent operating a home school
- Enrolled at least half time in school, training, or higher ed
- Exemption for part of the month EQUAL to exemption for entire month
- Self-attestation must be accepted, unless questionable (i.e., inconsistent with other verified information)

Temporary Good Cause for ABAWD Noncompliance

- Broadly defined (any circumstances beyond your control). DSS must accept applicant statement unless questionable. Examples include:
 - Family illness or emergency, natural disaster;
 - Lack of childcare;
 - Lack of transportation (including unsafe road conditions);
 - Court appearances;
 - Meetings with social workers, medical appointments, or “*other health related activities necessary for wellbeing*”;
 - Employer caused conditions (temporary closure or reduction of hours, discrimination, or seasonal work patterns).
- No hard limit on how long *temporary* good cause can last

ABAWD Changes During Certification Period

- Beneficiary is required to report if they are no longer working **80** hours per month. Failure to do so may result in over issuance (if exceeds **3** months and not exempt or with good cause).
- Beneficiary is **NOT** required to report if they become no longer exempt during recertification period (e.g., they are no longer chronically homeless).
 - This means loss of exemption **during** 6 month certification period does **NOT** cause overissuance or any countable months. Recertification interview and full screening for other exemptions, compliance, or good cause are required **before** countable months can begin.

ABAWD EXAMPLES

- John sings in the choir and ushers at his church which averages out to 10 hours per week. He also spends an average of 10 hours per week picking up cans and scrap metal to sell. Because the combination of self-employment and volunteer work equal 20 hours per week, John is ABAWD compliant.
- Betty is living between her car and shelters. This makes her chronically homeless, so DSS must consider her unfit for work and exempt from ABAWD.
- Mary is a single mom to a 16-year-old child who has been suspended from school for behavior problems related to a mental health diagnosis. Because this child needs supervision, Mary can claim an exemption due to caring for an “*incapacitated person*” OR temporary good cause for failure to comply with ABAWD.

BENEFICIARY RIGHTS

- If SNAP (food stamp) benefits are denied, reduced, or terminated due to alleged noncompliance with work requirements, the beneficiary has important rights.
- DSS is required to give written notice of a denial, reduction, or termination of SNAP benefits. The notice must state:
 - the reason for the action,
 - the effective date of the action, and
 - the name and contact information of the person to contact to request more information or to request a fair hearing to challenge the action.
 - The deadline to appeal is 90 days after the date of the notice.
- Beneficiaries have the right to be represented by legal counsel at their hearing. Free legal services may be available.

Resources & Referrals

- Work Registration rules - **FNS 240**
- ABAWD rules - **FNS 260**
- SNAP Appeal Process - **FNS 700**
- Legal Aid of North Carolina
 - Phone: 1-866-219-LANC (5262)
 - Website: <https://legalaidnc.org/>
- Charlotte Center for Legal Advocacy
 - (Mecklenburg & surrounding counties)
 - Phone: 1-800-438-1254
 - Website: <https://charlottelegaladvocacy.org/>
- Pisgah Legal Services
 - (Western North Carolina)
 - Phone: 1-800-489-6144
 - Website: <https://www.pisgahlegal.org/>



Upcoming Webinars

SNAP Eligibility for Immigrants & Public Charge
February 18th, 12-1pm

SNAP Application & Recertification Basics
March 4th, 12-1pm

SNAP Training Series for Community Partners
You must register for each session individually

SNAP WORK REQUIREMENTS
What's Changing and What's Not

SNAP work requirements can be confusing, especially with recent changes at the federal and state level. This training will break down what the current work requirements are, who they apply to, and who is exempt.

We will focus on what has changed, what has stayed the same, and common misconceptions that can affect eligibility. The goal is to help community partners provide accurate information and spot issues that may come up when assisting people with SNAP.

WEDNESDAY FEBRUARY 4TH
12:00PM-1:00PM

[Click Here to Register](#)

SNAP ELIGIBILITY
For Immigrants and Public Charge

SNAP eligibility rules for immigrants have changed significantly. As a result, some individuals and families who were previously eligible for SNAP may no longer qualify, while others remain eligible under specific categories.

This training will explain the current eligibility rules, who is affected by the changes, and which groups are no longer eligible for SNAP. We will also discuss common scenarios, including mixed-status households, and how these changes may impact families applying for or renewing benefits.

WEDNESDAY FEBRUARY 18TH
12:00PM-1:00PM

[Click Here to Register](#)

HOW TO APPLY FOR SNAP & KEEP BENEFITS
Application and Recertification Basics

This training will walk through the SNAP application and recertification process step-by-step. Topics will include how to apply, what documents are needed, interviews, timelines, reporting changes, and how recertification works.

The session will also highlight common problems that cause delays or benefit loss and share tips for helping people keep their SNAP benefits once approved.

WEDNESDAY MARCH 4TH
12:00PM-1:00PM

[Click Here to Register](#)





QUESTIONS




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