DEPARTMENT POLICY

SNAP Only

A Time Limited Food Assistance (TLFA) individual, also known as an Able-Bodied Adult without Dependents under the age of 14 (ABAWD), must meet specific work requirements to receive Supplemental Nutrition Assistance Program (SNAP) benefits. Failure to do so limits the individual's SNAP eligibility to three months within a 36-month period. TLFA individuals who meet all other SNAP eligibility criteria are eligible for three countable months of SNAP benefits during a 36-month period.

The 36-month period is a standardized period. Eligible individuals can receive three countable months of benefits within each of the following periods:

Current Period: January 1, 2025, through December 31, 2027.
Next Period: January 1, 2028, through December 31, 2030.

TLFA Locations

Effective November 1, 2026, all counties in Michigan except for the specified locations listed below will be subject to TLFA policy.

- Counties: Alcona, Cheboygan, Mackinac, Ogemaw, Oscoda, Presque Isle, and Schoolcraft.
- Cities: Detroit, Eastpointe, Flint, Jackson, and Saginaw.

ELIGIBILITY FACTORS

TLFA Individuals

All SNAP individuals aged 18 through 64 without dependents under age 14 are subject to TLFA policy unless deferred.

Note: The policy applies to the first calendar month after an individual's 18th birthday through the calendar month prior to their 65th birthday.

ORAL EXPLANATION

All individuals subject to the TLFA work requirements will be provided an oral explanation of their work requirements and will also receive the MDHHS-6015, Food Assistance Program Work

Requirements Notice, at application, redetermination, member add and when an individual becomes subject to the work rules outlining the TLFA related work requirements.

The oral explanation outlines the TLFA work requirements each individual must follow in order to receive food assistance.

The oral explanation must be customized to the individual and each work requirement that applies to the individual must be explained to the group member at application, redetermination, member add or when an individual becomes subject to the work requirements.

The specialist must also discuss the following:

- How the individual can be deferred from the work requirement; see *Deferrals* in this item.
- What is required to maintain eligibility; see *Satisfying TLFA Work Requirements* in this item.
- What is good cause; see *Good Cause* in this item.
- How to report a good cause reason or deferral; see *Deferrals* or *Good Cause* in this item.

The oral explanation will outline these talking points to assist the specialist with explaining this policy to each individual in the group who is subject to the work requirement.

Note: If all TLFA individuals are not available to hear the oral explanation themselves, the head of household may relay the information to them. Specialists must document the circumstance in Case Comments.

Screening

All individuals subject to TLFA should be screened for any deferrals they may qualify for at application, redetermination, member add or when an individual becomes subject to the TLFA work requirements.

Note: When an individual becomes subject to TLFA work requirements they must be re-screened before a countable month is applied.

TLFA DEFERRALS

Individuals meeting one of the criteria below are deferred from TLFA work requirements.

FAP Group Contains Child

A SNAP group includes an individual under age 14, even if the individual under age 14 is disqualified or otherwise not eligible; see Bridges Eligibility Manual (BEM) 212, SNAP Group Composition.

Verification:

Information known to the agency.

Pregnancy

In any stage of pregnancy.

The deferral will begin the month the department becomes aware and include the month of the child's birth or until the individual is no longer pregnant.

Verification:

Client statement, unless questionable.

Medically Certified Mentally or Physically Unfit

Determined to be medically certified as mentally or physically unfit for employment (even if temporary).

The mental or physical condition must make the individual unfit to work 20 hours per week on an ongoing basis. An individual is considered unfit for work if they meet the following criteria:

- Applied for/receiving temporary or permanent public or private disability benefits.

  This includes but is not limited to:

  - Veterans' disability benefits (any rating of disability).
  - Workers' compensation.
  - SSI application, approval or appeal.

- Participating in Michigan Rehabilitation Services program.
- State issued temporary or permanent disability benefits.

Verification:

If information regarding application or receipt of the disability benefits is known to the agency, no further verification is needed. If this information is not known to the agency, request proof of the receipt or pending application for disability benefits.

Obviously Mentally or Physically Unfit

Obviously mentally or physically unfit for employment, as determined by the Michigan Department of Health and Human Services (MDHHS) specialist.

To determine if an individual is obviously unfit for work, the MDHHS specialist must conduct an interview with the individual. A discussion of the individual's inability to work or participate in work activities for more than 20 hours per week on an ongoing basis is required to make the determination. The discussion should focus on the physical and/or mental challenges that affect or impact the individual's inability to work.

- ***A victim of domestic violence***

  An experience of domestic violence may indicate the individual is obviously unfit for work. The MDHHS specialist may identify an individual as obviously unfit for work if they are a victim of domestic violence.

- ***Struggling with drug or alcohol addiction***

  A struggle with drug or alcohol addiction may indicate an individual is obviously unfit for work.

  Individuals who are not participating in a treatment/rehabilitation program but are dependent on drugs or alcohol to maintain day to day function may be considered struggling with addiction.

Verification:

Client statement, unless questionable.

If questionable, a statement provided from a physician, physician's assistant, nurse, nurse practitioner, psychologist, designated representative of the physician's office, or a social worker indicating the individual is unable to work, is acceptable.

If domestic violence is questionable, documentation of service from a domestic violence shelter, medical records, court records (such as personal protection order or petition), police records (such as domestic disturbance response), school records (such as statement from school counselors), statement from a licensed therapist or counselor, or other case information (such as children's services), is acceptable.

If struggling with drug or alcohol addiction is questionable, verification of their participation in a substance abuse treatment program is acceptable. If the individual is not currently participating in a treatment program, written or verbal statement from a medical or mental health professional confirming the individual's alcohol/drug dependency negatively impacts their fitness to work is acceptable.

Indian, Urban
Indian, California
Indian

Indian

An individual is an Indian if they are a member of an Indian tribe.

Note: Indian tribe is defined as any Indian tribe, band, nation, or other organized group or community, including any Alaska Native village or group of regional or village corporation as defined in or established pursuant to the Alaska Native Claims Settlement Act, which is recognized as eligible for the special programs and services provided by the United States to Indians because of their status as Indians.

Urban Indian

An individual is an Urban Indian if they reside in an urban center and meet at least one of the following four criteria:

- Regardless of if they live on or near a reservation, is a member of a tribe, band, or other organized group of Indians, including those tribes, bands, or groups terminated since 1940 and those recognized now or in the future by the State in which they reside, or who is a

descendant, in the first or second degree of any such member;

- Is an Eskimo or Aleut or other Alaska Native,
- Is determined to be an Indian for any purpose under regulations promulgated by the Secretary of Interior; or
- Is determined to be an Indian under regulations promulgated by the Secretary of Health and Human Services.

Note: Urban center is defined as any community which has a sufficient urban Indian population with unmet health needs to warrant assistance under subchapter IV of the IHICA, as determined by the Secretary of Health and Human Services.

California Indian

An individual is a California Indian if they:

- Are a member of a federally recognized Indian tribe;
- Are a descendant of an Indian who was residing in California on June 1, 1852, if such descendant:
  - Is a member of the Indian community served by a local program of the Indian Health Service; and
  - Is regarded as an Indian by the community in which such descendant lives.
- Are an Indian who holds trust interests in public domain, national forest, or reservation allotments in California; or
- Are an Indian of California who is listed on the plans for distribution of the assets of rancherias and reservations located within the State of California under the Act of August 18, 1958, and any descendant of such an Indian.

Verification:

Client statement, unless questionable.

Office of Refugee Resettlement

Individuals participating in a local refugee contractor program for at least half time will be deferred from the TLFA work requirements as long as they continue to participate with the refugee contractor.

Verification:

Statement from the local refugee contractor.

DEFERRED FROM GENERAL WORK REQUIREMENTS

Individuals who are deferred from general work requirements outlined in BEM 230B, Deferrals are also deferred from TLFA work requirements, with the exception of individuals aged 60 to 64. Individuals who are subject to the time limits must meet the general work requirements.

Deferrals from the general work requirements include:

- Under age 16 or over age 59 (work registration age limits are different than the age limits under TLFA rules).
- Age 16 or 17 years old who is not the head of household.
- A head of household age 16 or 17 years old who:
  - Lives with a parent or person in that role.
  - Attends school at least half time.
  - Is enrolled in an employment training program at least half time.

  See BEM 240, Age and BEM 245, School Attendance and Student Status for verification requirements.
- A parent or other household member responsible for the care of a dependent child under age 6 (the child does not have to be in the SNAP group, nor reside with the caregiver).
- Responsible for the care of an incapacitated person (the incapacitated person does not have to be in the SNAP group, nor with the caregiver).
- Physically or mentally unfit for employment.

- Has applied for or is receiving unemployment benefits (including application or appeals).
- An active participant in an inpatient or outpatient substance abuse treatment program. This does not include AA or NA.
- An individual who has applied for both SNAP and SSI through the Social Security Administration. The application for SNAP and SSI must be made at the same time.
- Individuals employed, self-employed or in a work study at least 30 hours per week or receiving weekly earnings equal to or in excess of 30 hours times the federal minimum wage.
- An individual subject to and complying with FIP (TANF) work requirements.
- A student enrolled at least half-time in any recognized school, training program, or institution of higher education.

Note: Students enrolled half-time or more in an institution of higher education (Post-Secondary Education) must also meet student status; see BEM 245, Student Status.

Verification:

See BEM 230B, Employment-Related Activities: SNAP for detailed verification requirements.

General work registration requirements and TLFA work requirements are two separate policies, while related to each other, they stand alone.

Noncompliance and refusing employment penalties may apply to TLFA applicants or recipients; see BEM 233B, Failure to Meet Employment Requirements: SNAP.

SATISFYING TLFA WORK REQUIRMENTS

TLFA individuals who are not deferred must satisfy the TLFA work requirement to maintain SNAP benefits for more than three months within the 36-month period. There are several ways these individuals can satisfy the work requirement.

The TLFA work requirements must be explained to the individual at application, redetermination, or anytime the individual becomes subject to the TLFA work requirements (see *Oral Explanation* in this item). The purpose of this explanation is to identify the work rules the individual must follow, discuss how the individual can meet the TLFA work requirement and advise the individual the rules must be followed in order to receive food assistance beyond three months.

Note: All individuals subject to the TLFA work requirements will be provided an oral explanation of their work requirements and will also receive the MDHHS-6015, Food Assistance Program Work Requirement Notice, at application, redetermination, member add or when the individual becomes subject to the work rules outlining the TLFA work requirements.

For a SNAP benefit month to not be countable, a TLFA individual must perform one of the following:

Employment

Employed TLFA individuals must work at least 80 hours monthly (20 hours/week on average) **or** receive monthly average earnings of at least 20 hours/week multiplied by the federal minimum wage, in order to satisfy the TLFA work requirement.

Work includes:

- Work in exchange for money, including self-employment.
- Work in exchange for goods or services (in-kind).
- Unpaid (volunteer) work.

This activity cannot be combined with self-initiated community service/workfare to meet the work requirement.

Note: TLFA individuals do not have to make minimum wage in order to satisfy the work requirement.

Self-Initiated Community Service

Self-initiated community service (SICS) is unpaid work for a nonprofit organization in exchange for SNAP benefits. The number of hours worked must equal the monthly SNAP benefit divided by the state minimum wage, as determined by Bridges. Local MDHHS offices may maintain a list of nonprofit organizations willing to accept volunteers.

In Bridges, the question *Has the individual indicated an interest in completing self-initiated community service to meet the TLFA participation?* on the *FAP Time Limited Community Service Activity* page, must be answered, *Yes*, to identify individuals choosing SICS. This will end the automatic TLFA referral to the MWA and Bridges will generate the DHS-1997, Community Service Activity Report. The DHS-1997 will be sent monthly when Bridges indicates an individual intends to use this activity to meet their TLFA work requirement.

If an applicant has used countable months, but has initial countable months remaining, Bridges will approve the application for the remaining months. Verification of the monthly self-initiated community service, via the DHS-1997, will be required to avoid future countable months.

Note: Bridges will display the required SICS hours on the SNAP EDG, as well as populating them on the DHS-1997.

Educate the individual on SICS policy and potential sites. It is the individual's responsibility to approach the organization and to obtain the signed DHS-1997 from an agency representative certifying the number of hours worked each month.

Note: Individuals participating in SICS to meet their TLFA work requirement may not combine their SICS hours with any other activity hours. Additionally, the individuals are not eligible for Direct Support Services funds to support this activity; see BEM 232 Direct Support Services.

Verification:

DHS-1997, completed by the nonprofit or government organization.

Self-Initiated Community Service/Workfare – Multiple Group Members

If a SNAP group has more than one TLFA member and one member selects SICS or workfare (in counties where available) to meet their required hours, all mandatory group members will meet the work requirement, as the hours of participation for SICS and workfare are based on the SNAP groups benefit amount divided by the state minimum wage (round down).

TLFA members of the same SNAP group may split the required SICS or workfare hours in any combination between them or a

single TLFA group member may choose to complete all the required hours on behalf of the household.

Regardless of the combination, by the end of the month, the household must complete the required hours, or the entire group may receive a countable month (unless the TLFA work requirement was met another way).

Example: In a single-member case with $292 in monthly SNAP benefits, the individual must perform 21 hours per month of community service ($292 / state minimum wage = 21.26 hours).

Example: In a two-member case with $268 in monthly SNAP benefits, a total of 19 hours ($268 / state minimum wage = 19.51 hours), must be performed. The number of hours performed by each individual may vary, but the total of 19 hours must be met.

Example: Harold and Maude are a married couple who are both subject to TLFA work requirements. They opt to complete SICS as their activity. Their combined hourly requirement for SICS is 43 hours a month. Harold volunteers at the local food bank for 43 hours each month. Both TLFA members meet the requirement and do not receive any countable months.

In the month of October, Harold only completed 38 hours of the groups required 43 hours of SICS. Maude does not complete any hours of SICS. It is determined Harold does not have good cause, and both TLFA members receive a countable month.

Michigan Works! Agency Employment and Training Program (In counties where available)

Individuals may participate in a Michigan Works! Agency (MWA) Employment and Training program, such as Food Assistance Employment and Training (FAE&T).

Individuals may receive a referral to the MWA, if available in their county, and participate 80 hours monthly (20 hours/week on average) in an employment and training program.

Individuals in an MWA employment and training component cannot be required to participate more than 30 hours per week.

The MWA may permit a participant to substitute hours of education to meet the 80-hour requirement.

Local variations, restrictions and/or policies may apply. Check with the local MWA to determine what employment and education/training services are available in the area.

Individuals may choose to meet their TLFA work requirement by participating in a workfare activity through the MWA. The number of hours worked must equal the SNAP benefit amount divided by the state minimum wage, as determined by Bridges.

Note: MWA employment and training activity hours (excluding workfare) may be combined with an individual's work hours to meet the 80-hour monthly requirement.

Referral to MWA

Bridges will generate an automated FAE&T TLFA referral to the MWA One Stop Management Information System (OSMIS), as well as generate the DHS-4785-F, FAP Employment and Training Appointment Notice, which is sent to a TLFA individual, at the following times:

- Application.
- Redetermination.
- Case change or end of a deferral.
- Member add.

Bridges will automatically refer each mandatory TLFA individual to the local MWA when the MDHHS specialist runs eligibility. If the TLFA individual does not attend the MWA, OSMIS will interface this information to Bridges, but there will be no negative action to the benefits.

Note: Mandatory TLFA refugee individuals will receive an automatic referral to the MWA.

The DHS-4785-F will be generated overnight and can be viewed the next day in *Bridges Correspondence History*. When generating the TLFA referral and the DHS-4785-F, Bridges allows six days for the appointment notice to be processed through central print before the scheduled orientation appointment for the individual. Bridges will include the date, time, and location to attend the food assistance employment and training orientation on the DHS-4785-F.

If the TLFA individual indicates to the MDHHS specialist they intend to complete SICS instead of participating at the MWA, the referral to the MWA will be stopped or ended. The MDHHS specialist will indicate this in Bridges by answering Yes to the question, *Has the individual indicated an interest in completing self-initiated community service to meet the TLFA participation?* on the *FAP Time Limited Community Service Activity* page. This will end the referral to the MWA and Bridges will automatically generate the DHS-1997, Community Service Activity Report.

Note: Individuals working 20-29 hours or those who are participating in SICS will not receive the automated DHS-4785-F.

Bridges will notify OSMIS when a referred applicant is denied SNAP benefits, a SNAP group member is removed, or the SNAP is closed.

MWA Assessment

MWA assesses employability and need for employment support services. TLFA individuals are then assigned to an appropriate employment-related activity.

MWA Participation

OSMIS will interface participation compliance daily which will be populated into the *FAP Time Limited - MWA Activity* page. Participation hours will be summarized per activity and month. Bridges will determine if the TLFA individual has met their required hours or will be assigned a countable month.

The specialist will need to go into OSMIS to view other information relevant to the MWA participation.

The MWA may continue to monitor individuals for 90 days after employment begins, even if the SNAP case closes, for retention services. OSMIS will interface all terminations to Bridges through the overnight file.

Case Documentation

Bridges will track each countable month on the *FAP Time Limited Food Assistance - Details* page which displays a month-by-month account of work, work-related activities, self-initiated community service, deferrals, countable months, case number changes and closures.

FAE&T PROVIDER DETERMINATION

The Food Assistance Employment and Training Program (FAE&T) is available to all adults who receive SNAP and are not receiving FIP. The program is available through the MWA and is an opportunity to learn valuable skills that will assist the individual with becoming employable. The FAE&T program is also a way for TLFA individuals to meet the TLFA work requirement.

A FAE&T provider determination is issued when the MWA has determined they are unable to serve an individual in their program. The MWA will notify the MDHHS specialist within 10 days of the provider determination being made via the FAE&T provider determination interface in Bridges. A MDHHS-6354, Provider Determination Notice, will be generated notifying the individual of the provider determination and a task will be created requiring action by a MDHHS specialist. The MDHHS specialist must contact the individual within 10 days of the provider determination being issued. The MDHHS specialist will discuss the reason for the provider determination and what the next steps will be for the individual. The MDHHS specialist must document in case comments the individual has been contacted about the provider determination and what was discussed during the call.

If a provider determination has been received for a TLFA individual, a countable month will not be issued if the work requirement was not met for the month the provider determination occurred. The individual may accrue a countable month the next full benefit month following the provider determination, unless the individual fulfills the TLFA work requirement, is deferred, receives good cause or lives in a waived area.

FAE&T Provider Determination Options

If it is determined that an individual is not a good fit for an FAE&T component when volunteering at the MWA, one of the following options must be completed by the next redetermination:

Option 1: Refer the individual to an appropriate employment and training component.

- The MDHHS specialist should reassess the individual to determine if a referral back to the FAE&T program is

appropriate. The individual may be better suited for a deferral or referral to another FAE&T component.

- There is an appropriate and available component in the FAE&T program.
- The individual must also receive case management services.

Option 2: Reassess the individual for mental or physical fitness.

- If the individual is not mentally or physically fit, the individual will not be referred to the FAE&T program.
- The specialist must also choose to reassess the individual for other deferrals from the general work requirement as applicable.

Option 3: Coordinate with other federal, state, or local work force or assistance programs to identify work opportunities or assistance for the individual.

- Consider this option for individuals with needs that fall outside of the scope of the FAE&T program.

PENALTIES

Noncompliance or refusing employment penalties in BEM 233B, Failure to Meet Employment Requirements: SNAP do not apply to TLFA countable months. See C*ountable Month* and *36-Month Time-Period* policies in this item.

Countable Month

A countable month is a calendar month in which a full SNAP benefit is posted to an EBT account, and the recipient does not meet a TLFA deferral or work requirement, without good cause.

The MDHHS specialist must explain to each TLFA individual the work requirement is in effect for the first full month of benefits and the individual is responsible for meeting the work requirement in that first full month.

Example: A TLFA individual applies for SNAP on February 6th and is approved. February is a prorated benefit month and the individual is not required to meet the TLFA work requirements. With March being the first full month of benefits, the individual is referred

to the MWA but does not attend. The individual does not complete 80 hours of MWA participation or meet the work requirement in another way. March is a countable month.

Example: The MWA documents the individual was assigned to a work activity on August 1st, but did not meet the participation requirement for the month. If the individual did not have good cause, August is a countable month.

A month is also countable if the individual begins meeting the work requirement but does not continue through the end of the month, without good cause, and the individual does not become deferred.

Example: A nonprofit agency documents an individual offered janitorial help, which is self-initiated community service. On October 25th and 26th, the individual completed 10 hours (out of 13 hours needed to fulfill the $180 SNAP benefit). The individual did not return to complete the hours and did not have good cause. October is a countable month.

Out of State Countable Months

A month in which an individual received SNAP benefits in another state as a TLFA individual, without meeting the work requirement or deferral criteria, is countable. Accept the other state's word and document in Bridges on the *FAP Time Limited - Out of State Details page*.

Note: Countable months an individual received from another state within Michigan's current 36-month period are included in the calculation when determining SNAP eligibility, if the TLFA individual resides in an area not covered by the ABAWD waiver.

Example: Lenny applied for SNAP in November and reported previously receiving SNAP benefits from Oklahoma before moving to Washtenaw County. The MDHHS specialist confirmed Lenny had received one countable month for October. The MDHHS specialist added the out of state month to the *FAP Time Limited - Out of State Details* page. Lenny has two countable months remaining.

Example: Maude moved to Iron County from Colorado in June and reported receiving SNAP benefits ongoing. The MDHHS specialist confirmed March and April were countable time limited months. The MDHHS specialist added the months to the *FAP Time Limited - Out of State Details* page. Maude has one countable month remaining.

Since Iron County is covered by the ABAWD waiver, Maude is not required to meet TLFA work requirements and will not receive a countable month. If the ABAWD waiver ends for Iron County during the current 36-month period, Maude will have one countable month remaining.

Bridges tracks each TLFA individual's countable months, on the *FAP Time Limited - Details* page, as well as displaying the countable months on the *FAP EDG* page. Other SNAP group members may remain eligible even if one TLFA group member uses three countable months and is no longer eligible; see BEM 550, Disqualified or Ineligible Persons, and *Case Closure and Member Disqualification*, in this item.

Met Requirements

In some instances, individuals may have met TLFA work requirements but still received a countable month. Reasons for met requirements:

- Late hour entry.
- Hearing decision.
- Work requirement was met – other.

If the individual or MWA verifies the individual met requirements, indicate in the TLFA summary under the *Good Cause tab*, the met the requirement reason and document in the comments box how the individual met requirements.

Example: John completed SICS with a local non-profit agency in the month of October. John returned the DHS-1997 to verify SICS on November 3rd. John received a countable month for October due to not verifying SICS hours until November. The MDHHS specialist indicated in the *FAP Time Limited - Details* page that John met requirements due to late hours entry. Bridges removed the countable month and sent John a MDHHS-5538, Time Limited Food Assistance Countable Month Correction.

Good Cause

Good cause is having a valid reason for failing to work at least 80 hours monthly (20 hours/week on average), failure to participate in an employment and training program at the MWA or failure to participate in workfare or self-initiated community service.

An individual who worked or participated less than the required hours may be considered to have good cause if each of the following conditions are met:

- The absence was due to circumstances beyond the individual's control.
- It was temporary.

Document the good cause determination on the *FAP Time-Limited Good Cause* page. Case comments detailing the reason for good cause are mandatory. The following are examples of good cause reasons:

- Personal illness.
- Death or illness of a household member requiring the presence of the TLFA individual in the home.
- Unavailability of transportation.
- Lack of work (employer must verify).
- Household emergency.
- Temporarily unfit for work.

Verification of Good Cause

Verification of good cause is only required if the specialist considers the claim questionable. If questioning the good cause, the specialist will need to answer Yes to the question *Is the good cause claim questionable* on the *FAP Time Limited - Good Cause* page.

A MDHHS-3503 will be triggered when EDBC is run, to request verification. Once received, the specialist will need to return to *FAP Time Limited - Good Cause* page and select the appropriate verification source from the drop-down menu to approve the good cause reason. If the verification is not returned, the month will remain countable.

If the month the good cause was not verified is the third countable month, Bridges will take the appropriate action to close the SNAP case (if a single person case) or disqualify the TLFA individual.

36-Month Time-Period

Individuals who are neither deferred nor meeting the TLFA work requirement may receive SNAP benefits for only three countable months in a 36-month period.

If an applicant has used some countable months, but has initial countable months remaining, Bridges will approve the application for the number of months remaining.

Follow redetermination procedures before the end of the current benefit period; see BAM 210, Redetermination/Ex Parte Review. Unless the individual is deferred or meets the TLFA work requirement, deny further eligibility until the 36-month period expires or the individual meets *regained eligibility criteria* in this item, whichever is earlier. Do not continue eligibility based on individual assurance that requirements will be met.

REGAINED ELIGIBILITY

An individual who has received three countable months of SNAP benefits can regain SNAP eligibility (within the 36-month period) by meeting one of the following TLFA work requirements within any 30-day period after the last benefit month but prior to application or member add request:

- 80 hours of employment.
- Self-initiated community service for the number of hours previously determined by Bridges (the number of hours must equal the SNAP benefit amount divided by state minimum wage) that would have equaled the individual's SNAP benefit for that period.

An individual who has received three countable months of SNAP benefits and now meets a TLFA deferral (see *TLFA Deferrals* in this item) at application or when requested to be added to the SNAP group may regain SNAP eligibility until their deferral ends.

Note: Individuals who regain eligibility via deferral, then lose the deferral, must meet one of the other criteria above before benefits can be authorized, including the three-month extension.

Do not prospect regained eligibility; unless deferred, the applicant must have met the 30-day work requirement prior to application. If the individual wants to perform self-initiated community service, determine the monthly benefit and required hours. The individual must complete the community service hours prior to authorization of any benefits. If the individual plans to work, 80 hours must be completed prior to authorization of any benefits.

At application treat the work requirement like a verification requirement. If the individual meets the work requirement within any 30-day period prior to the application, the regain eligibility date is the date of application. If the individual fails to meet regain criteria within any 30-day period prior to the application date, the application will be denied.

For member adds regaining eligibility, the individual must meet the regain eligibility requirements within any 30-day period prior to regaining eligibility. The date the regain eligibility verification is received is the individual request date and the regain eligibility date.

Individuals who regain eligibility remain eligible each month they continue to meet one of the above work requirements or are deferred.

Verification:

Verification of how the work requirement was met is required in order to regain eligibility.

If verification of meeting the work requirement is not returned the application may be processed for the remaining SNAP group members or denied after the verification due date; see BAM 115, Application Processing.

Regained Eligibility - Expedited SNAP

TLFA individuals who indicate on the application or during the SNAP interview they have regained eligibility but have not provided proof of their regained eligibility activity, can be eligible for expedited food benefits if all other eligibility factors are met. The MDHHS specialist will request the regained eligibility verification and approve expedited SNAP.

TLFA individuals who have not indicated they have regained eligibility on the application or during the SNAP interview are not eligible for expedited food benefits.

Verification:

Verification of how the TLFA work requirement was met prior to application is required in order to fully regain eligibility.

If verification of meeting the work requirement is not returned the MDHHS specialist will remove the TLFA individual from the SNAP group or close the SNAP for failure to return verifications after the verification due date; see BAM 115, Application Processing.

Note: The individual will not be eligible for expedited SNAP the next time they apply since they did not meet TLFA requirements on the previous application.

Three-Month Extension

Individuals who have regained eligibility by meeting the TLFA work requirement, then fail to maintain the work requirement, receive three additional months of benefits if otherwise eligible. The first month of these extended months, is the first month the work requirement is not met. The MDHHS-5539, Notice of Time Limited Food Assistance Extension Months, will be sent.

The extended months of benefits cannot be interrupted, regardless of whether the individual participates in a work activity or becomes deferred. Bridges will end the benefits during the extension months only if the individual fails to meet other SNAP eligibility criteria. The extension is available only once in a 36-month period.

Example: The individual regained TLFA eligibility for the first time by meeting the work requirement in July, then failed to meet it in August and is not deferred. They are eligible for extension benefits for August, September and October. To receive November benefits, they must first meet the work requirement or be deferred.

Example: The individual regains eligibility for July due to a medical condition that does not extend beyond July. They are not eligible for extension benefits in August, September or October because they did not regain eligibility through the work requirement. To receive further benefits during the 36-month period, they must meet one of the criteria in *Regained Eligibility* in this item.

Note: A policy exception is required for any adjustment to extension months.

After the Three-Month Extension

There is no limit to the number of times an individual can regain eligibility. Following the extension, for the remainder of the 36 months, Bridges will determine the individual's eligibility on a month-to-month basis. Each month, the individual must meet the TLFA work requirement or be deferred to receive benefits.

If the individual fails to meet the work requirement after the three-month extension, SNAP benefits must be recouped for any benefits received for any months the work requirements were not met or the individual was not deferred.

CASE CLOSURE OR MEMBER DISQUALIFICATION

Bridges will determine when the countable months (either the initial three or from an extension) have been exhausted for each individual; see *Countable Months* in this item.

- Around the 15th day of the third countable month Bridges will generate the DHS-142-A, TLFA Third Countable Month/Out of State Countable Month Notice, to inform the individual that unless they meet the work requirement for the third countable month the SNAP will close, or the individual will be disqualified from the SNAP group.
- If the countable months are exhausted, Bridges will generate the MDHHS-1605, Notice of Case Action, with adequate notice to close the case or disqualify the TLFA individual.
- If a TLFA individual in a SNAP group becomes ineligible, a pro-rata share of their income counts toward the remaining eligible group members eligibility determination.

Note: If the benefit period will expire at or before the third countable month, complete the redetermination.

BENEFIT PERIODS

Bridges will determine a benefit period based on the individual's situation at application and redetermination and will assign the benefit period end date to avoid ineligible issuances.

If the individual has already used countable months, Bridges will assign the appropriate benefit period for each month to ensure benefits are not issued incorrectly. Bridges will review data entered in Bridges for employment, MWA participation or community service when determining eligibility for the next benefit period.

For individuals deferred due to an incapacity expected to last longer than three months, Bridges will set the benefit period to end the month the incapacity will end; see BEM 230B, Deferral for Disability and *TLFA Deferrals*, in this item.

Change Reporting

TLFA applicants and recipients are required to report as specified in BAM 105, Rights And Responsibilities. Do not include TLFA applicants or recipients who are not working 20 hours or more per week in simplified reporting; see BAM 200, Food Assistance Simplified Reporting.

It is the TLFA individual's responsibility to report when hours of work drop below 80 hours monthly. For simplified reporting groups, the drop in hours must be reported by the 10th of the following month. If a change is not reported timely, establish an overpayment for any ineligible months; see BAM 700, Benefit Overpayments.

If a SNAP recipient following simplified reporting requirements becomes subject to TLFA requirements during the benefit period, do the following:

If a change is reported during the benefit period:

- Process the change according to policy outlined in BAM 220, Case Actions.
- Inform the individual of the eligibility requirements for TLFA as outlined in policy; see *Oral Explanation* in this item.
- Bridges will assign the appropriate benefit period based on individual participation documented in the system.

Note: SNAP groups where all mandatory TLFA individuals are working over 20 hours per week are simplified reporters. When a drop in work hours below 20 hours per week (80 hours per month) is reported, the group will remain simplified reporting until their next semi-annual contact or redetermination (whichever comes first).

If a change is discovered at redetermination:

- Inform the individual of the eligibility requirements for TLFA; see *Oral Explanation* in this item.
- Process the redetermination as a new TLFA application.
- Do not process any overpayments or penalize the individual.

When informing individuals, Bridges will issue the MDHHS-6015 Food Assistance Program Work Requirements Notice, to everyone who becomes subject to the TLFA requirements. Use the Oral Explanation to explain Time Limited Food Assistance policy to every TLFA individual at application, redetermination, and when a change results in TLFA status (for example, individual reports employment ended); see *Oral Explanation* in this item.

Note: Bridges will generate the DHS-142-B, Time Limited Food Assistance Requirements Ending, to inform individuals when they are no longer subject to TLFA work requirements. This notice will be issued in the following instances:

- The individual becomes deferred.
- The individual is no longer subject to TLFA requirements.

Example: Aretha lives in Kent County and is subject to the TLFA work requirements. On July 28, Aretha turned 65 years old. Bridges will issue the DHS-142-B, indicating Aretha is no longer subject to the time limit, due to turning age 65.

REPORTS

TL-200-203 TLFA Reports

The TL-200-203, TLFA Reports, will allow users to view important details on TLFA participants and their current participation status.

This daily report may be broken out by county and district. The report identifies individuals aged 18 through 64 who are subject to TLFA work requirement policy. These individuals are identified by

participation status, as well as the deferral/participation reason, deferral end dates, and the number of countable months used.

Local offices may use this report in any manner considered beneficial.

MI Reports - Active FAP TLFA Individuals

The Active FAP TLFA Individuals report allows users to view detailed information regarding TLFA individuals for current or past months. This report includes individuals aged 18 through 64 without dependents under 14 years of age included in their SNAP group, who may be subject to TLFA work requirements.

The report may be viewed at a monthly or daily level. There are four additional filter options: Geo Group, County, Office, and/or Deferral Participation Reason.

The report details provide the associated SNAP office location, individual name, case number, individual ID, deferral participation reason, if the individual is active with the MWA, if the individual has indicated interest in self-initiated community service, and the number of countable months used.

The MI Report provides users with the ability to view the data in various ways, including the ability to export the report to Excel. Local offices may use this report in any manner considered beneficial.

VERIFICATION REQUIREMENTS

Verify eligibility factors, work requirement criteria and educational participation.

Verify a reason for deferral from the TLFA work requirement only if it is not obvious or the information provided is questionable (for example, information is unclear, inconsistent or incomplete); see BEM 230B, Deferrals.

Document in the case record the reason for granting the deferral and the length of time before the continuing need for the deferral will be reviewed.

Note: Do not deny an application solely because an employer has not verified the income and hours. After taking reasonable measures to obtain actual income and hours, consult the individual and use the best available information. Document in Bridges the attempts to verify and why they were unsuccessful.

LEGAL BASE

SNAP

Public Law 104-193, as amended. Public Act 294 of 2000.
7CFR 273.2.12, 24.
Federal H.R. 1 bill.