



Food and
Nutrition
Service

1320 Braddock Place
Alexandria, VA
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Date: April 13, 2020

Subject: Supplemental Nutrition Assistance Program – Questions and Answers,
COVID-19, Set #3

To: All State Agency Directors
Supplemental Nutrition Assistance Program

The Food and Nutrition Service (FNS) is issuing the attached set of questions and answers for Supplemental Nutrition Assistance Program (SNAP) State agencies to address inquiries received about program administration in response to the COVID-19 public health emergency.

The contents of this document do not have the force and effect of law and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies. All of the flexibilities and changes discussed in this document apply only during the public health emergency, unless a different time period is specified.

State agencies should contact their respective FNS Regional Offices with any questions.

Sincerely,

**JESSICA
SHAHIN**

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JESSICA SHAHIN
Date: 2020.04.13
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Jessica Shahin
Associate Administrator
Supplemental Nutrition Assistance Program

Enclosure

C. Outreach

1. What is allowable in terms of promoting SNAP and SNAP outreach during the COVID-19 Pandemic?

States may revise their outreach plans to include additional requests for Federal reimbursement in order to expand outreach efforts during this time. Such revisions to increase Federal reimbursements must be submitted to the FNS Regional Office prior to implementation. In order to expedite approval of Plan amendments, States should consult the Outreach Plan Guidance and utilize the templates provided there to ensure that all necessary information is included. States that choose to start activities without FNS approval risk not receiving reimbursement for those activities.

Allowable outreach activities include eligibility pre-screening, application assistance, and informational websites and other social media sites that provide factual information that is not intended to persuade an individual to apply for SNAP. Unallowable outreach activities include recruitment activities designed to persuade an individual to apply for SNAP benefits, and radio, television, and billboard advertisements that promote SNAP benefits and enrollment. More information on allowable and unallowable activities can be found on pp.15-20 of the [Outreach Plan Guidance](https://fns-prod.azureedge.net/sites/default/files/snap/Outreach_Plan_Guidance.pdf): (https://fns-prod.azureedge.net/sites/default/files/snap/Outreach_Plan_Guidance.pdf).

D. ABAWDs (Able Bodied Adults Without Dependents)

1. An ABAWD was in his or her last month of receiving benefits while not meeting the ABAWD work requirement in March 2020. Would the ABAWD continue to be eligible for benefits in April 2020?

Yes. Section 2301 of the Families First Corona Virus Relief Act (FFCRA) suspends the time limit for participation in SNAP under section 6(o) of Food and Nutrition Act of 2008 (FNA) for certain ABAWDs. FNS' March 20 Memo (available at: <https://www.fns.usda.gov/snap/ffcra-impact-time-limit-abawds>) clarifies that:

State agencies are prohibited from limiting ABAWDs' eligibility under section 6(o)(2) of the FNA unless the individual is not complying with a work program or workfare program offered by the State that meets the standards of section 6(o)(2)(B) or (C).

Accordingly, States are prohibited from limiting an individual's eligibility based on the ABAWD time limit, unless the individual is not complying with a work program or workfare program offered by the State. This provision applies through the month after the month in which the public health emergency ends.