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United States  
Department of  
Agriculture

Food and Nutrition Service  
SUBJECT: Clarifications of the American Recovery and Reinvestment Act's (ARRA)  
Effect on Pledge States for Employment and Training  
Questions and Answers #4

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TO: Regional Directors  
Supplemental Nutrition Assistance Program (SNAP)  
All Regions

Attached are questions and answers in response to issues raised by the States through various discussions concerning SNAP provisions of the American Recovery and Reinvestment Act (ARRA) of 2009 (P.L. 111-5), which was enacted on February 17, 2009.

Please direct any questions to Moira Johnston or Dale Walton in the Program Design Branch.

*Arthur T. Foley*  
Arthur T. Foley  
Director  
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Attachment

**Supplemental Nutrition Assistance Program (SNAP) and the  
American Recovery and Reinvestment Act of 2009 (ARRA)**

**Effect on Pledge States for Employment and Training**

**Questions and Answers #4**

**Section 101(e) Treatment of Jobless Workers (ABAWDs)**

**Question 1:** If a pledge State decides to stop offering a qualifying work program effective April 1, and instead chooses to exempt all ABAWDs from the time-limit as provided for by ARRA, will it be required to return any or all of its allocated share of the FY 2009 \$20 million additional ABAWD allocations it has already received for FY 2009?

**Answer:** Pledge States that decide to stop offering qualifying work opportunities to ABAWDs in their 3<sup>rd</sup> month of eligibility must return the unspent portion of their allocated share of the FY 2009 \$20 million ABAWD grant effective April 1, 2009.

However, pledge States that continue to offer a qualifying work opportunity for ABAWDs, in accordance with their approved SNAP Employment and Training (E&T) Program State Plans, may retain the funds for the remainder of the fiscal year.

**Question 2:** For the remainder of FY 2009 and in FY 2010, must a State commit to offering a qualifying work opportunity to *every at-risk ABAWD in the State* in order to qualify for pledge funds, or may the State limit such programs to certain areas of the State?

**Answer:** The State may opt to limit operations of qualifying work programs to certain areas of the State or certain categories of ABAWDs. For example, a State may limit its offers of education/training or workfare opportunities to ABAWDs in designated counties even if the rest of the State is operating under the exemptions provided for by ARRA. As long as the State fulfills its ABAWD pledge in certain areas, it may continue to qualify for a share of the \$20 million ABAWD grant. A State does not need waivers or exemptions from FNS for the ABAWDs not served; they are covered under ARRA.

**Question 3:** What must a State do to qualify for pledge funds in FY 2010?

**Answer:** In order to qualify for pledge funds in FY2010 a State must commit to providing a qualifying work opportunity to ABAWDs who are in their 3<sup>rd</sup> month of eligibility and who the State has chosen not to exempt under ARRA. The State must clearly designate its criteria for designating which ABAWD's will be served in its State plan.

**Question 4:** How does a State apply for pledge funds in FY 2010?

**Answer:** Interested States must follow the normal procedures for attaining pledge State status detailed in SNAP regulations at 7 CFR 273.7(c)(7), which describe the E&T State Plan process for prospective pledge States. FNS will evaluate each submission and allocate the FY 2010 \$20 million ABAWD grant among those States awarded pledge status.