



Guide to the ABAWD Time Limit

Handbook for CalFresh Outreach Workers

First Edition. August 2018

Acknowledgements

This guide was written based on the CA Department of Social Services' handbook. Special thank you to the reviewers and the ABAWD outreach toolkit advisory workgroup for their revisions and feedback.

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INTRODUCTION

CalFresh is California's first line of defense against hunger. CalFresh recipients with an able-bodied adults without dependents (ABAWD) time limit are people who have CalFresh-only cases, are between the ages of 18 and 49, are considered able-bodied, and do not have dependents. With the loss of California's statewide ABAWD waiver, people with an ABAWD time limit are only eligible for benefits for three full months out of a 36-month period unless they are exempt or meet the work requirement.

California will be one of the last states to re-implement the ABAWD time limit, after it was waived nationally during the recent recession. Hundreds of thousands of people have lost their benefits in states that have already implemented the time limit.

CalFresh outreach workers will play an important role assisting people with an ABAWD time limit so that they can maintain their CalFresh. In order to do this, outreach workers must be familiar with ABAWD time limit rules and policies. This Guide is based on the California Department of Social Services ABAWD Handbook for county administrators and is intended as a resource for the CalFresh outreach community. It provides a general overview of the ABAWD rules, who is subject to the ABAWD time limit, exemptions to the time limit, the work requirement, and what this means for CalFresh outreach providers.

HOW TO USE THIS GUIDE

While it is beneficial for all CalFresh outreach workers to know about the ABAWD time limit, this Guide is meant to be a comprehensive resource for outreach workers in counties that are no longer covered under an ABAWD waiver.

In counties where the ABAWD time limit will be re-implemented, we suggest reading the Guide entirely and utilizing it as a resource when specific questions come up.

If your county is not re-implementing the time limit you should still understand the overall concepts as they will come up in county and statewide conversations. We recommend reading the following five sections:

- [GENERAL OVERVIEW](#)
- [WHO IS SUBJECT TO THE ABAWD RULES?](#)
- [EXEMPTIONS AND VERIFICATIONS](#)
- [WORK REQUIREMENT](#)
- [WORDS MATTER](#)

Counties without an ABAWD waiver and implementing the time limit in 2018

- San Francisco
- San Mateo
- Santa Clara

This Guide is meant to be a living document, to be updated as things change. Help us make it better. Send us your comments and suggestions for future revisions. If you can't find the answer to the question you're looking for let us know so we can add it.

GENERAL OVERVIEW

Three major points

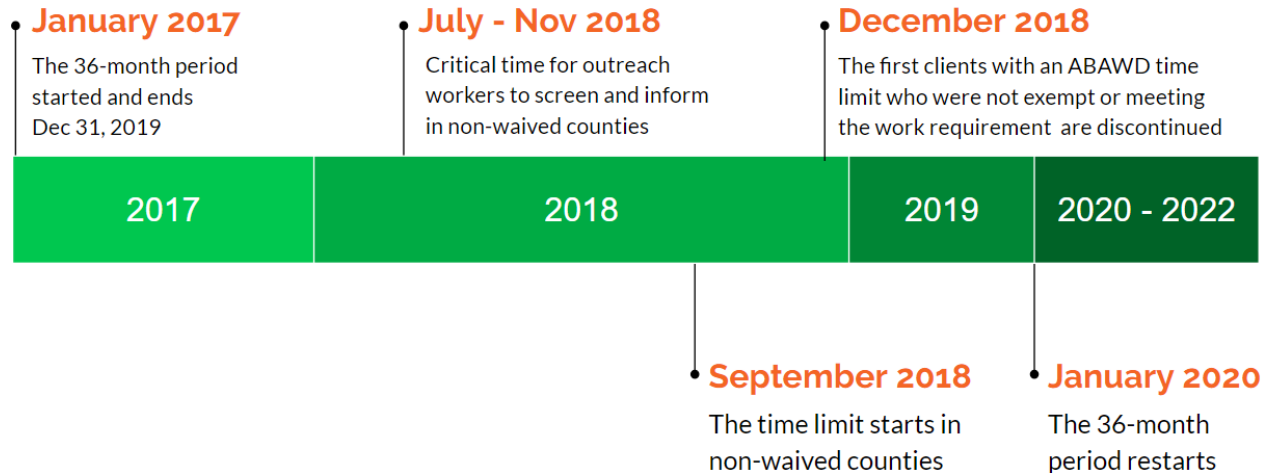
1. All counties must identify CalFresh recipients subject to the ABAWD rules and report it to the California Department of Social Services (CDSS).
2. In counties without a waiver, adults with an ABAWD time limit will have to meet the work requirement or be exempt to be able to receive CalFresh for more than three full months in a 36-month period. (See the [“Regaining eligibility”](#) section for more information.)
3. The ABAWD time limit may apply in different counties every year, depending on which ones no longer meet the requirements for a waiver. CDSS will release an All County Letter (ACL) every year to update which counties must implement the time limit.

Background information

- High statewide unemployment rates qualified California for a statewide waiver of the rule. The waiver, which can be for a county, an area or the entire state, is submitted by the California Department of Social Services for approval by the USDA, FNS. Unemployment has decreased and the statewide waiver will expire on August 31, 2018, but area waivers will remain in all but three counties: San Francisco, San Mateo, and Santa Clara.
- In California, the 36-month period started on January 1, 2017 but the time limit does not start until September 1, 2018. Therefore, counties who have the waiver lifted in September, will start with 20 months already into the 36-month period.
- Adults with an ABAWD time limit in those three counties, who are not exempt or meeting the work requirement, will be limited to receiving CalFresh benefits for three full months between September 1, 2018 and December 31, 2019.
- Adults to whom the ABAWD rules apply living in counties outside of the counties of San Francisco, San Mateo, and Santa Clara are not subject to the ABAWD time limit.
- On January 1, 2020, the 36-month period starts again for the entire state and all people subject to the ABAWD time limit are eligible for another three full months of CalFresh until December 31, 2022.

Timeline

- **July 2018:** CalFresh participants a potential ABAWD time limit, in the three counties losing the waiver, begin to receive notices from their county office.
- **July – November 2018:** Critical time for outreach workers to screen adults for a potential ABAWD time limit, provide information on upcoming changes and on actions that can be taken to meet the work requirement in non-waived counties.
- **September 1, 2018:** Time limits begin in San Francisco, San Mateo, and Santa Clara counties. Adults with an ABAWD time limit that are not exempt or meeting the work requirement in those counties will be limited to receiving CalFresh benefits for three full months between September 1, 2018 and December 31, 2019. All counties must continue to identify and track adults subject to ABAWD rules.
- **December 2018:** Clients subject to the time limit who have received CalFresh benefits for three full months without being exempt or meeting the work requirement are discontinued from benefits. They might be able to receive benefits again (*see the [“Regaining eligibility”](#) section*).



Notices informing clients of the ABAWD time limit will only be sent in counties that are losing the waiver. Clients in all other counties will not receive a notice.

WHO IS SUBJECT TO THE ABAWD RULES?

A person between the ages of 18 – 49, receiving CalFresh, but not CalWORKs, who is able-bodied and not living with a minor in their CalFresh household.

An adult to whom the ABAWD rules apply to may or may not have a time limit. If the time limit applies today it does not mean that it will apply tomorrow. It's important for clients to let their county know if they start working or if their circumstances change because they may be able to keep getting CalFresh.

Eligibility tips

- A 17-year-old becomes subject to the ABAWD rules the month after their 18th birthday, unless their birthday falls on the 1st of the month. All other adults in the household, who were exempt because of this person, will no longer be exempt due to residing in a CalFresh household with a minor under the age of 18 when the 17-year-old turns 18. Additionally, the 18-year-old may become subject to the ABAWD rules if they do not meet the criteria for an ABAWD exemption.
- A 49-year-old stops being subject to the ABAWD rules in the month of their 50th birthday.
- The adult living with a minor in their CalFresh household does not have to be the parent of the child or responsible for the child in order to qualify for the exemption.
- The child does not have to be a CalFresh eligible household member, the child could be receiving SSI or be undocumented.
- The child can be away from the home for up to 30 days.

Every adult should be screened for an ABAWD time limit. There can be multiple adults with an ABAWD time limit in one household.

WHAT ARE THE EXEMPTIONS TO THE TIME LIMIT AND WHAT VERIFICATIONS ARE NEEDED?

If an adult subject to the ABAWD rules qualifies for an exemption, they are NOT subject to the time limit. They may need to submit verification to be exempt.

Note that living in a county with an area waiver is not an exemption, but does mean that the adult can continue to receive CalFresh for as long as they are eligible without a time limit and without being required to meet the work requirement. All counties in California will still track CalFresh recipients who are subject to the ABAWD rules.

EXEMPTIONS SUMMARY

1. Pregnancy (any stage)
2. Physically, mentally, or emotionally unable to work 80 hours a month
 - a. Applied/receiving temporary or permanent, public or private, disability benefits or veteran's disability benefits
 - b. Obviously unable to work based on eligibility worker observation/judgement or if the following indicators are present:
 - i. Unable to work due to chronic homelessness
 - ii. Unable to work due to alcohol or drug addiction
 - iii. Unable to work due to experiencing or escaping domestic violence

IMPORTANT: Chronic homelessness, struggling with alcohol or drugs and domestic violence are **NOT** exemptions by themselves. These are considered indicators that an individual may be unfit for work. If a client is experiencing any of these situations, the worker must explore whether there is a physical or mental reason that hinders the person's ability to work for 20 hours per week.
 - c. Medically certified as unable to work for 80 hours a month
3. Participating in an Office of Refugee Resettlement Training Program
4. Exempt from CalFresh work registration. Work registration exemptions include:
 - a. Responsible for caring for an incapacitated person or a child under 6 (neither has to live in the home)
 - b. Applied for or receiving unemployment insurance

- c. Receiving weekly earnings, from a job or self-employment, equal to or greater than the federal minimum wage multiplied by 30 hours (\$217.50)
- d. Migrant or seasonal farm worker under contract to begin work in the next 30 days who will work 30 hours a week or earn \$217.50/week
- e. Enrolled in school, training program or institution of higher education on at least a half-time basis, including high school

EXEMPTIONS

1. Pregnancy

The exemption starts the month of conception and counts until and includes the month of the child's birth. This exemption may be added retroactively. Once a child under 18 is in the CalFresh household, the adults would no longer have an ABAWD time limit.

Verification:
Client statement is acceptable. If questionable, then medical verification can be requested.

Scenario

Jade discovers she is five months pregnant. She has used two of her three countable months during the last five months. The county removes the two countable months Jade used and codes her as exempt due to pregnancy from the ABAWD time limit.

Source: CDSS

2. Physically, mentally, or emotionally unable to work for 80 hours a month

A person may be physically or mentally unable to work for 80 hours per month due to a temporary or permanent situation or a condition that may or may not be obvious. This includes various illnesses, disabilities, conditions, and life circumstances that reduce a person's ability to work for 80 hours per month. In these cases, the person should be exempted from the time limit until their situation changes and they are able to work 80 hours per month. The ability to work 80 hours per month is key; even if a person is able to work, if they are physically, mentally, or emotionally unable to work 80 hours per month they should qualify for this exemption.

Verification:
Depends on the subcategory.

This exemption has various subcategories of indicators that someone might be unable to work for 80 hours a month. If someone is experiencing an indicator they will not be automatically exempt under "unable to work". A conversation between the individual and the eligibility worker should take place around the impact on the person's ability to work. The indicators are:

a. Applied/receiving temporary or permanent, public or private, disability benefits or veteran's disability benefits

This includes having applied for OR receiving benefits such as:

- Veterans disability benefits: any rating of disability will count and make that person exempt from the ABAWD time limit rules.
- Workers compensation
- Pending SSI application or non-pay status SSI
- State issued temporary or permanent disability benefits

Verification:
Documentation of a receiving or pending application should be provided unless this is already known by the county.

b. Obviously unable to work based on eligibility worker observation/judgement

This subcategory requires a discussion with the individual about their ability to work 80 hours a month. It can include things like a broken leg or an apparent mental illness. Eligibility workers are required to make this determination regardless of whether the interview takes place in-person or over the phone. In general, this category includes things that can be seen, heard or smelled including dental and personal hygiene issues.

Verification:

None. The eligibility worker will assess and document the exemption in the case file.

Scenario

An individual is participating in a telephone interview and has been identified as an ABAWD. While conducting the interview, the eligibility worker notes that the individual is incoherent and having trouble following and answering the questions being asked. The eligibility worker thoroughly documents the conversation in the case notes. The eligibility worker determines that this individual is “Obviously Mentally or Physically Unable to Work” via telephone and is therefore exempt from the ABAWD time limit.

Source: CDSS

c. **Medically certified as unable to work for 80 hours a month**

Verification of a medical condition may be requested when the eligibility worker determines that the condition is not obvious. The condition can be permanent or temporary, and could arise from a physical or mental condition. The optional [CalFresh Request for Medical Verification form](#) can be used but the client can also submit other documentation as verification. There are a variety of health professionals that can help document the condition, it is not limited to physicians, but can include drug and alcohol counselors, occupational therapists, psychologists, physical therapists, social workers, etc. For a complete list of health professions see the [verification form](#).

Verification:

A written or verbal statement from a medical or mental health professional can be accepted. If a medical statement is not available, a collateral contact statement can be accepted.

Scenario

An individual informs the CWD that they have been diagnosed with severe depression and are unable to maintain employment. The client's inability to work is not obvious to the eligibility worker. The eligibility worker requests a medical certification that the individual is unable to work for 20 hours per week or 80 hours per month. The individual provides a written statement from their qualified medical or mental health professional stating their inability to maintain employment. This individual is exempt from the ABAWD time limit because they have been medically certified as mentally unable to work.

Source: CDSS

d. **Unable to work due to chronic homelessness**

The CalFresh definition of homelessness is defined as lacking a regular or fixed nighttime residence. This includes people who might be staying in a car, a shelter, a halfway house or someone else’s home for less than 90 days. Chronic homelessness is further defined as individuals who meet the CalFresh definition of homelessness AND who:

- Have been homeless for six months or more OR
- Have been homeless more than once in the last year OR
- Say they are unable to meet their basic needs. This includes but is not limited to adequate shelter, heating, cooling, running water, clothing, food and electricity.

Verification:

None. The eligibility worker will assess and document the exemption in the case file.

Note that people meeting the CalFresh definition of chronic homeless are NOT automatically considered exempt. To qualify for an exemption, they have to have a physical or mental reason they are unable to work. Chronic homelessness is an indicator that an individual is unable to work and should trigger the eligibility worker to ask questions regarding the individual’s ability to work or maintain employment for 20 hours per week.

Scenario
An individual states they are currently living at a bus station and have been living there for nine months. This individual meets the definition of chronic homelessness. The eligibility worker notes that this individual is speaking to people who are not in the room. The worker thoroughly documents the facts of the interview and determines this individual is “Obviously Unable to Work” and is exempt from the ABAWD time limit. Source: CDSS

e. **Unable to work due to alcohol or drug addiction**

Participation in a drug or alcohol treatment program is NOT required for this exemption.

Verification:

Can provide evidence of participating in a treatment program. A written or verbal statement from a health professional might be requested. Client statement is acceptable if no other source of verification is available.

Scenario

An individual informs the CWD that they are not currently working because they are struggling with drug addiction which makes it difficult for them to obtain employment because they experience severe physical withdrawal symptoms when they stop using. This individual is “Obviously Unable to Work” and is exempt from the ABAWD time limit.

Source: CDSS

f. Unable to work due to experiencing or escaping domestic violence

The domestic violence definitions are the same as in the CalFresh regulations. It includes a person escaping any type of violence or abuse from a current or previous partner, including same-sex relationships or relatives.

Verification:

- Providing evidence of staying in or waiting for a shelter
- A written or verbal statement from a health professional
- A police report

If no source of verification is available, client statement is acceptable.

Scenario

An individual notifies the CWD that they are in an emotionally abusive relationship with their domestic partner and they are on the waiting list to reside in a shelter. They explain they have severe anxiety and depression as a result of their situation. This individual is “Obviously Unable to Work” and is exempt from the ABAWD time limit.

Source: CDSS

3. Participating in an Office of Refugee Resettlement Training Program

Participation should be at least half-time to be exempt from the ABAWD time limit. (See the [“Resources”](#) section for programs available in California.)

Verification:

Provide verification of participation, collateral contact statements are accepted.

Scenario

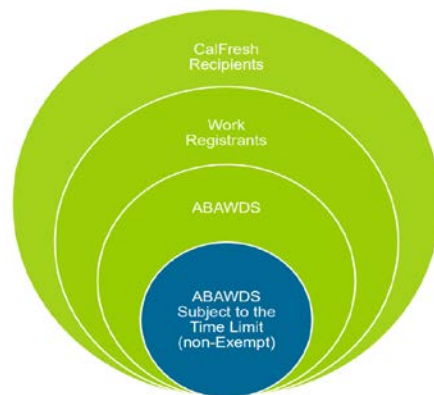
William is 20 years old, has no dependents, and is in his fourth month of participating in a Refugee Resettlement Training Program. William is exempt from the ABAWD time limit for as long as he’s in the Refugee Resettlement Training Program.

Source: CDSS

4. Exempt from CalFresh Work Registration

CalFresh work registration requirements are currently in effect and the rules for work registration have not changed. The work registration rules and ABAWD rules are separate policies and are applied independently of one another. Work registration rules and ABAWD time limit rules somewhat overlap in regards to exemptions. If a CalFresh recipient is exempt from work registration, then they are also exempt from the ABAWD time limit.

Verification:
Depends on the work registration exemption.



Source: CDSS

Work registration and exemptions from work registration take place at the time of application and recertification. There are NO forms or other things that clients have to do. The county determines work registration status automatically.

All work registration exemptions apply to people to whom the ABAWD rules apply to.

The work registration exemptions that could apply to people with an ABAWD time limit are:

a. **Physically or mentally unable to work**

Although worded similarly to the ABAWD rule exemption, this exemption is part of the work requirement rules and if a person is exempt from the work requirement then that person is also exempt from the ABAWD time limit.

Verification:
None. Client statement is acceptable.

b. **A regular participant in a drug addiction or alcoholic treatment and rehabilitation program.**

Like the rest of the work registration exemptions, this exemption stands on its own as part of the work registration exemptions, but can also be applied to people with an ABAWD time limit.

This work registration exemption is narrower than the indicator listed above. The ABAWD rules list drug and alcohol addiction as an indicator that someone might be physically or mentally unable to work. For this work registration exemption, the individual must be participating in a treatment program.

Verification:
Evidence of participation in the treatment program.

c. **Responsible for caring for an incapacitated person or a child under 6**

The incapacitated person or child does not have to be in the CalFresh household or be a relative.

Verification:
None. Client statement is acceptable.

Scenario

Byron is a CalFresh recipient who travels to his grandmother's house to provide her care. Because of the amount of care he provides, he is unable to maintain a job. He is exempt from CalFresh work registration and is therefore exempt from the ABAWD time limit.

Source: CDSS

d. **Applied for or receiving unemployment insurance**

Verification:
None. If questionable, the county will verify with the EDD office.

Scenario

A CalFresh recipient contacts their county office and informs them that they are now receiving Unemployment Insurance Benefits (UIB). This person is exempt from CalFresh work registration and is therefore exempt from the ABAWD time limit.

Source: CDSS

e. Receiving weekly earnings, from a job or self-employment, equal to or greater than the federal minimum wage multiplied by 30 hours (\$217.50)

To determine if an individual qualifies for this exemption, the federal minimum wage of \$7.25 is multiplied by 30 hours. If the person has weekly earnings equal to or greater than \$217.50, then they are exempt from work registration and thus exempt from the time limit.

Verification:

Proceed as usual with income verifications. Possible verifications include pay stub, letter from employer, etc. If none is available, the county must accept an affidavit from the client.

Scenario

Raul is self-employed and makes \$1,750 a month. His earnings of \$1,750 a month are divided by 4.33 (the number used by the county office as the average number of weeks in the month) to get his average weekly earnings.

$$\$1,750 \div 4.33 = \$404.15 \text{ average weekly earnings}$$

$$\$404.15 > \$217.50$$

Since his weekly earnings are greater than the federal minimum wage multiplied by 30 hours, then he is exempt from work registration and exempt from the ABAWD time limit.

- f. Migrant or seasonal farm worker under contract to begin work in the next 30 days who will work 30 hours a week or earn \$217.50/week

Use the same process as listed above based on the federal minimum wage.

Verification:

Proceed as usual with income verifications. Possible verifications include pay stub, letter from employer, etc. If none is available, the county must accept an affidavit from the client.

- g. Enrolled in school, training program or institution of higher education on at least a half-time basis, including high school

The work registration exemption applies during vacation and recess.

The exemption does not apply if there is a change in enrollment status due to graduation, expulsion, suspension or dropping out.

Enrollment in high school counts as at least half-time for ABAWD rules. Many high school seniors turn 18 in their senior year. (See section on [“Who is subject to the ABAWD rules?”](#) for more information.)

Verification:

Proceed as usual with school enrollment verification.

Scenario

Adonis is a twenty-year-old student, with no dependents, attending UC Berkeley full time. He is exempt from work registration and is also an ABAWD exempt from the time limit. Although Adonis is exempt from the ABAWD time limit, he is still subject to student eligibility rules.

Source: CDSS

Things to keep in mind about exemptions:

- The category “unfit or unable to work” is broader than the CalFresh definition of disabled.
- The person does not need to be receiving disability benefits to be considered “unable to work.”
- Sometimes a person might be able to work, but not consistently for 80 hours per month.
- When the condition or life circumstance of the exemption is temporary or short term, the client is exempt until their next SAR 7 or recertification unless verification is received with a different expected end date.

Inform your client about the exemption they might qualify for and what verifications they should provide the county office. Make sure to include this information on the application. If there is no relevant space add it in the note section. Encourage your client to bring up the exemption during their eligibility interview.

WHAT IS THE 15 PERCENT EXEMPTION?

Federal law provides that States are allocated a certain number of individual exemptions to the ABAWD time limit based on the State's caseload of people subject to the time limit (non-exempt) who are "at risk". "At risk" means the individual is at risk of losing CalFresh eligibility due to the ABAWD time limit.

The number of these "individual exemptions" allocated to the state is equal to 15 percent of the statewide "at-risk" caseload of people subject to the ABAWD time limit and not exempt. It is referred to as the "15 percent exemption." States are allowed to exempt certain adults from the ABAWD time limit for one month for any specific circumstance the state deems appropriate.

Each 15 percent exemption is equal to one month of CalFresh benefits for one adult with an ABAWD time limit. The 15 percent exemption is only an option once the three countable months of CalFresh benefits have been used. These exemptions are only available to people who are at risk of losing their CalFresh eligibility because they did not meet the work requirement.

The California Department of Social Services (CDSS) informs each county how many of these exemptions each county has via an annual All County Information Notice (ACIN).

Each county can choose when to apply the 15 percent exemption and how many times to apply it per individual.

CDSS recommends that counties allow three 15 percent exemptions per individual every three-year time period based on the following:

- Overissuance and error protection: In cases where the household was issued benefits after they used their three months of CalFresh benefits.
- Individuals who fell short of meeting the work requirement.
- Individuals re-entering the community from prison or jail, on probation or who have a criminal record.
- Individuals who are seasonally employed, including but not limited to those hired for the holiday season, tax season, agricultural workers, etc.
- Dependent child turning 18: a 15 percent exemption can be applied to the existing adult, but also the child who turned 18 and became subject to the ABAWD time limit.
- Former foster youth between the ages of 18- 21.

- Adults in a family reunification program after having their children removed from the home for more than 30 days.
- Additional 15 percent exemptions could be given when the adult is close to no longer being subject to the time limit, to prevent churn and reduce administrative workload. For example, if someone is close to turning 50 or for the father the month before a baby is born.

Scenario

A 15 percent exemption could be given to a person who worked 10-19 hours per week, averaging 40-79 hours per month, but not meeting the 80 hours in the month required.

Source: CDSS

HOW DO THE ABAWD RULES APPLY TO IMMIGRANTS RECEIVING CALFRESH THROUGH CFAP?

- The California Food Assistance Program (CFAP) provides CalFresh benefits to immigrants who are otherwise ineligible for the federal program based on their immigration status.
- Individuals receiving CalFresh through CFAP often don't know that they are receiving state-funded CFAP benefits and not federally-funded CalFresh benefits.
- Adults receiving CalFresh through CFAP are also subject to the ABAWD time limit rules.
- Individuals receiving CalFresh through CFAP are NOT eligible for a 15 percent exemption.
- If an individual transitions from CFAP to federal CalFresh, their eligibility starts over. This means that if someone with an ABAWD time limit that had already used their three months of benefits and still didn't meet the work requirement or exemptions, they would again receive another three months of benefits. The 36-month period is the same.

Clients with an ABAWD time limit receiving CalFresh through CFAP will receive the same notices as everyone else.

WHAT IS THE WORK REQUIREMENT?

If an adult has an ABAWD time limit and does not qualify for an exemption, then they must satisfy the ABAWD work requirement to be able to receive CalFresh for more than three full months in the three-year time period. To satisfy the work requirement, individuals have to work or complete allowable “work activities” for an average of 20 hours a week or a total of 80 hours in a month. Work hours and most “work activities” can be combined for the total of 80 hours in a month. Alternatively, the work requirement can also be met by participating in workfare. To summarize, in total, there are three options to meet the work requirement. These options are listed below. Options 1 and 2 can be combined and option 3 is not to be combined and stands on its own.

Note: The ABAWD work requirement is different from the exemption listed previously about weekly earnings equivalent to the federal minimum wage multiplied by 30 hours. If a client qualifies for this exemption under work registration, then they are also exempt from the ABAWD time limit and do NOT have to satisfy the work requirement. They can continue to receive benefits for as long as they are exempt.

Three options to meet the work requirement:

1. **Work including employment, being self-employed or doing in-kind (work in exchange for goods or services).**

An example of this would be a person who does maintenance around the home in exchange for free housing, child care, or food.

VERIFICATION: Proceed as usual with income verifications. Possible verifications include pay stub, letter from employer, etc. If none is available, the county must accept an affidavit from the client.

2. **“Work activities” include:**

a. **Community service or volunteer work**

VERIFICATION: This can be verified via a written statement that includes the number of hours volunteered and the signature of an organization representative. The optional [Community Service Verification](#) form can be used. A verbal statement from the organization is also acceptable.

b. Certain qualifying CalFresh Employment & Training (E&T) components:

- i. Educational programs
- ii. Vocational training
- iii. Job search hours count if they are combined with another component. Only up to 9 hours per week (averaged monthly) of job search hours count. If the job search hours are delivered through a WIOA program (see “c” below) then 20 hours per week of job search meet the ABAWD work requirement.

VERIFICATION: No verification required. This information is known to the county.

Not all counties have E&T programs, currently 36 counties have a program. (See “[Resources](#)” for the list of counties and more information on E&T programs.)

Client participation in an E&T program is optional.

c. A program under the Workforce Innovation and Opportunity Act (WIOA)

- i. “WIOA Title I programs include Adult and Dislocated Worker Employment and Training Activities and Youth Workforce Investment Activities. WIOA employment and training programs are offered through American Job Centers (often referred to as one-stop centers), which is the workforce service delivery system that helps people with job search and training. One-stop centers provide a range of services including career counseling, job listings, and job training.” Source: [CLASP](#)

VERIFICATION: This information could already be known to the county if participating in a county sponsored program. Otherwise provide verification of participation, which can be a collateral contact statement.

d. A program under section 236 of the Trade Act of 1974

- i. These are programs providing job search, job club, on-the-job training, etc. to individuals whom the Employment Development Department (EDD) identified as negatively impacted as a result of relocation of production or services from the U.S. to foreign countries.

VERIFICATION: This information could already be known to the county if participating in a county sponsored program. Otherwise provide verification of participation, which can be a collateral contact statement.

3. Workfare

Workfare is when a CalFresh recipient works without pay to receive benefits. Workfare CANNOT be combined with any other work or work activities to meet the ABAWD work requirement.

If workfare is used to meet the ABAWD work requirement, individuals may NOT need to meet the 80 hours/month requirement. In most cases, the number of hours needed to meet the ABAWD work requirement through workfare will be less than 80 hours per month. Instead, the number of hours required is calculated by dividing the household's CalFresh benefit amount by the highest local minimum wage associated with the client's residence address and rounding down to the nearest hour.

Federal minimum wage is \$7.25 and the California minimum wage is \$11.00. Some counties and cities have higher minimum wage rates. When the local minimum wage rate is higher, employers are required to pay the higher local wage. The highest local wage should be used to determine the number of workfare hours required for the CalFresh household.

Number of monthly workfare hours required for the entire CalFresh household:

$$\frac{\text{Household CalFresh benefit amount}}{\text{Highest local minimum wage associated with client's address}} = \text{Number of hours rounded down to the nearest hour}$$

The workfare hours required apply to the entire CalFresh household. This means that if there is more than one adult with an ABAWD time limit in the household then collectively, they only have to complete that number of hours. It does not matter how the hours are

split between the adults with an ABAWD time limit and one household member with an ABAWD time limit can complete all hours for the entire household.

Scenario one

Gaby lives in San Jose where the minimum wage is \$12.00. She is eligible for \$137 in CalFresh benefits and chooses to participate in her county's E&T workfare program. To calculate the hours she should participate in workfare to meet the ABAWD work requirement we do the following calculation:

$$\$137 \div \$12 = 11.42 \text{ rounded down to 11 hours}$$

If Gaby completes 11 hours of workfare per month she will be meeting the ABAWD work requirement and will be able to receive CalFresh benefits without a time limit or accumulating countable months.

Scenario two

Glen and Maggie are adults subject to the ABAWD time limit living together. They volunteer to participate in workfare through the county CalFresh E&T program. Glen and Maggie's monthly CalFresh allotment is \$180. The current minimum wage in California is \$11.00 per hour. The county uses the state minimum wage because the local minimum wage is at the same and not higher than the state, so the state rate applies in this scenario. The county calculates the household's required number of workfare hours by dividing the household CalFresh allotment of \$180 by the state minimum wage of \$11.00.

$$\$180 \div \$11.00 = 16.36 \text{ rounded down to 16 hours}$$

The total number of required workfare hours is 16 hours per month. Glen and Maggie share the responsibility of completing these hours. Glen participates in 10 hours of workfare and Maggie participates in 6 hours of workfare and have both satisfied the ABAWD work requirement for the month.

Source: CDSS

There are a lot of activities that fall under the category of workfare. It includes:

a. Activities under an E&T program

i. Established workfare

This means participating in a county established workfare program.

ii. Self-initiated workfare

This means participating in workfare through a nonprofit that the adult initiated in a way that is comparable to a county established workfare program.

iii. Work experience component

iv. Workfare under the E&T program has a 30-day job search component that can be counted as meeting the ABAWD work requirement.

VERIFICATION: No verification required except for self-initiated workfare, the client will need to provide a signed verification of volunteer hours performed.

b. Non-E&T program activities also administered by the county office

i. Optional workfare

ii. Volunteer workfare

iii. Comparable workfare: this includes general assistance (GA) workfare components

VERIFICATION: This information could already be known to the county if participating in a county sponsored program. Otherwise provide verification of participation, which can be in the form of a collateral contact statement.

GOOD CAUSE

When an adult with an ABAWD time limit is unable to meet the work requirement because of a situation outside of their control, the county should grant good cause. There are clear specific circumstances that qualify as good cause and it is not granted solely at the county worker's discretion. When good cause is granted, the adult will receive CalFresh benefits as if they had met the work requirement and will not have to use one of their three countable months.

Good cause can be granted for many reasons including, but not limited to, if a person was sick, had to take care of a sick family member, had an emergency, or lacked transportation. Good cause may also be applied when there is a declaration of a disaster. There is no verification required, the eligibility worker will document the reason for good cause in the case record.

Encourage your client to contact the county any time they might have good cause. The client might not know that this is an option to them.

WORDS MATTER

The CalFresh ABAWD eligibility rules are complex to administer and because of this outreach workers may be required to ask personal questions. CalFresh outreach workers can decrease stigma by being mindful of the words they use when talking to and about people with an ABAWD time limit. Using language that is less stigmatizing may also help people self-identify, which will be an important first step in maintaining CalFresh eligibility. CalFresh outreach workers may also find it helpful to let clients know that the questions are being asked only to determine eligibility, that there are no right or wrong answers, and that their information will be kept confidential.

One way to use less stigmatizing language is to use people-first language. People-first language is the standard when working with people with disabilities or other medical conditions and is recommended when screening for potential ABAWD exemptions and ability to meet the work requirement. This means putting the person before the potential category or situation they are in, and not referring to the person as the category or situation they are in. For example, instead of saying “he is a diabetic,” using person-first language you would say “he has diabetes.” The table below provides some examples of people-first language related to the ABAWD time limit.

Preferred words and phrases

Words/phrases to avoid	Preferred words/phrases	Reason
They are ABAWDs	People with an ABAWD time limit	Using people-first language prioritizes the individual and describes their situation instead of defining the person as the situation they are in.
Unfit for work	Unable to work 80 hours per month or Does your physical, mental or emotional health allow you to work 80 hours or more a month? or Do you have a personal situation that stops you from being able to work 80 hours or more per month?	We have used the term “unable” instead of “unfit” in this guide but the CalFresh regulations use the term “unfit.” We recommend using “unable” when speaking to clients.

Disabled	<p>Person with a disability or Person with an intellectual, cognitive, developmental disability or Person with an emotional or behavioral disability or Person with a mental health or psychiatric disability</p>	
Homeless	Without a home or regular place to sleep, for example staying in a car or in someone else's home for less than 90 days	People may not identify as homeless
Unfit for work due to alcohol or drug addiction	Are you unable to work due to alcohol or drug use OR in a drug or alcohol treatment program?	It might be difficult for people to talk about struggling with an addiction
Unfit for work due to being a victim of domestic violence	<p>Experiencing or escaping violence or abuse from a current or previous partner or relative?</p> <p>Violent behaviors include, but is not limited to verbal abuse, intimidation, threats, being afraid of the person, being isolated, at the economic control of someone, being stalked, being neglected, being deprived of medical care, having property destroyed, having pets harmed, etc.</p>	It might be difficult for people to talk about struggling with domestic violence. Sometimes people will say they are not in a domestic violence situation but will identify with the description of violent behaviors experienced in domestic violence. It's recommended to use the description to help people self-identify.
Responsible for taking care of an incapacitated person	Taking care of someone who needs help taking care of themselves or is sick	

Doing in-kind work in exchange for goods or services	Working for free in exchange for housing, child care food or other items	
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WHEN ARE CLIENTS EXPECTED TO REPORT CHANGES?

Adults subject to the ABAWD time limit and not living in a waived area are required to report any time their work hours including qualifying work activities fall under 80 hours a month within 10 days of the occurrence. If an adult with an ABAWD time limit suddenly becomes exempt or meets the ABAWD work requirement, it is their responsibility to inform the county so that they don't use countable months. The SAR 7 will be revised to include questions relevant to the ABAWD time limit.

Clients will fall into one of four possible scenarios

<p>EXEMPT SHORT-TERM / TEMPORARY</p> <ul style="list-style-type: none"> ● Certification: 12 months AND the county must follow up with the household at the anticipated date of exemption. ● Reporting: SAR 7 ● Time limit: No, as long as exemption applies 	<p>EXEMPT</p> <ul style="list-style-type: none"> ● Certification: 12 months ● Reporting: SAR 7 ● Time limit: No, as long as exemption applies
<p>MEETING WORK REQUIREMENT</p> <ul style="list-style-type: none"> ● Certification: 12 months ● Reporting: SAR 7 AND required to report when work hours drop below an average of 80 hours a month within 10 days of the drop in hours ● Time limit: No, as long as meeting work requirement 	<p>NOT MEETING WORK REQUIREMENT</p> <ul style="list-style-type: none"> ● Certification: 12 months AND the county will contact the client monthly. The county will discontinue after the third countable month of benefits has been issued. The discontinuance notice must be mailed 10 days before discontinuing the case to allow clients time to report a change in circumstances. ● Reporting: Client should notify the county if they become exempt or begin meeting the ABAWD work requirement to not accumulate countable months. ● Time limit: Yes, unless they begin meeting the ABAWD work requirement or become exempt.

HOW LONG WILL ADULTS WITH AN ABAWD TIME LIMIT BE CERTIFIED FOR?

The certification periods for adults with an ABAWD time limit is 12 months. If the adult has an exemption that is expected to be temporary, the individual will be exempt until their next SAR 7 or recertification unless verification is received that shows an end date before the next SAR 7 report or recertification.

If an individual is not exempt and not meeting the work requirement at the time of application or recertification, and they do not inform the county that anything has changed, then the county will assume that after receiving benefits for three full months that person has used up all their countable months and will send a discontinuance notice. The county will discontinue the case 10 days after sending the notice.

Scenario

Kenyatta is an adult with an ABAWD time limit and an injured hand. Her physician gave her a note stating it would take her 2 months to heal. She provides this note to the eligibility worker during her interview in mid-December. The eligibility worker informs her that she has an ABAWD time limit, but is exempt due to her injured hand for 2 months, after the 2 months, she will have to qualify for another exemption or meet the work requirement in order to receive CalFresh for longer than three full months.

Mid-February her exemption is believed to have ended and her full three countable months are March, April and May. In April, the county mails an ABAWD Countable Month Letter for month one (March), and in May the county mails an ABAWD Countable Month Letter for month two (April). In June, Kenyatta receives a Notice of Discontinuance for Failure to Meet the ABAWD Work Requirement. She is confused asks the food bank's CalFresh outreach coordinator for help. The outreach worker learns that Kenyatta had some complications recovering- it actually took her 4 months to heal, but she did not inform the county office. The outreach worker concludes that Kenyatta should have been exempt through mid-April and should have only accumulated one countable month, May. The outreach worker informs Kenyatta that she should submit her medical verification as soon as possible and talks to her about options for meeting the work requirement moving forward so that she can continue to receive CalFresh benefits.

WHAT ARE COUNTABLE MONTHS?

An adult with an ABAWD time limit who is not meeting the work requirement and is not exempt can only receive benefits for three full months, those three full months are known as the three countable months.

- These must be full months of benefits, meaning not prorated or partial benefits issued. This means that generally the month of application will not be considered a countable month since a prorated benefit will most likely be received for that month.
- Countable months do not need to be used consecutively.
- If the adult qualified for an exemption at any time during the month then it is not a countable month.
- Countable months can be removed retroactively for any month in which either the work requirement was met or the individual qualified for an exemption. As in the case of when an individual becomes pregnant.

Scenario one

Ernie is an adult with an ABAWD time limit who is not meeting the work requirement and is not exempt. He applies for CalFresh on December 3, he receives a slightly lower amount of benefits for December and the full benefit amount in January. If he continues to not meet the work requirement or become exempt in the upcoming months his countable months would be January, February and March.

Clients might not know that their countable months can be retroactively removed. Discuss options with your clients and encourage them to submit appropriate verifications as soon as possible.

Moving from a waived area to a non-waived area (no time limit county → yes time limit county)

- When an adult with an ABAWD time limit moves to a non-waived area (a county in which the time limit does apply) they will have to meet the work requirement or qualify for an exemption to not accrue countable months.
- The individual does not have to meet the work requirement or be exempt during the month of the move because they were living in a waiver area for part of the month, but

would have to meet the work requirement or qualify for an exemption the following month to not accrue a countable month of benefits.

- Benefits received prior to the move, while living in the waived area, do not count toward the individual's countable months.

Moving from a non-waived area to a waived area (yes time limit county → no time limit county)

- When an individual moves to a waived area they are no longer subject to the ABAWD time limit. They no longer have to meet the ABAWD work requirement or qualify for an exemption in order to receive CalFresh for longer than three full months in a three-year period.
- The county will still identify that person as an ABAWD, but the time limit does not apply.
- Even if the person had already received their three full countable months and been discontinued in the previous county, they may still receive CalFresh in the new waived county if they re-apply and are otherwise eligible.
- An individual receiving benefits prior to the move, and not discontinued, can request an inter-county transfer.

Moving from non-waived to non-waived area (yes time limit county → yes time limit county)

- The individual would still have to meet the ABAWD work requirement or be exempt to receive CalFresh benefits for more than three months in the three-year time period.

Moving from out of state

Countable months acquired in other states also count in California when California's 36-month period overlaps with the other state's time period. This is the case even if the individual would have been exempt if living in California. The county office, and not the client, is responsible for verifying whether or not countable months have been used out of state.

REGAINING ELIGIBILITY: WHAT HAPPENS AFTER THE THIRD COUNTABLE MONTH?

After the third countable month the individual is discontinued for not complying with the ABAWD work requirement. However, they can regain eligibility in the future if they either:

- a. Meet the work requirement for 30 consecutive days (prospective work hours do not count in regaining eligibility, they must have been worked in any 30 consecutive day period, not necessarily the last 30 days) OR
- b. Become exempt at any point in the month OR
- c. Move to a waived area - they would no longer have a time limit OR
- d. The statewide 36-month period restarts

Additional Three Consecutive Months

If a person regains eligibility by meeting the ABAWD work requirement and then subsequently stops, they can receive CalFresh benefits for an additional three full months to be used consecutively. At the end of the three consecutive month period they will be discontinued unless they begin meeting the work requirement or qualify for an exemption.

The three consecutive months are only available once in the 36-month period. The key point is that they are only available to people regained eligibility for CalFresh by working and then stopped.

Three consecutive months begin in the first month after the client informs the county that they are no longer meeting the work requirement for a second time. They are issued consecutively and they are only available once in the 36-month period.

In the future, if that individual became CalFresh eligible again by meeting the ABAWD work requirement or because they qualified for an exemption, they would receive CalFresh during those months. The individual would be required to meet the work requirement or be exempt every month in order to maintain eligibility for CalFresh since they have already used their three full countable months and received the three consecutive months too. If they stopped meeting the ABAWD requirements for a third time, or any time thereafter, that person would be discontinued from CalFresh.

Scenario

August 2018- Chase is unemployed, he applies for and receives CalFresh. He is informed he has an ABAWD time limit and can only receive CalFresh benefits for three full months between September 1, 2018 and January 1, 2020 unless he meets ABAWD work requirement or qualifies for an exemption.

November 2018- Chase has used up his full three countable months of CalFresh benefits (September, October, November) and is still unemployed and unable to meet the ABAWD work requirement. He is discontinued.

January 2019- Chase finds a temporary job and has been working 25 hours a week for the last 30 days. He applies for and receives CalFresh. He is meeting the ABAWD work requirement and is not subject to the time limit.

February 2019- Chase is laid off, he notifies the county, and the county notifies him he will only receive CalFresh benefits for three additional consecutive months unless he meets the ABAWD work requirement or qualifies for an exemption.

June 2019- Chase has used up his three consecutive months of CalFresh (March, April, May) and is discontinued for not meeting the ABAWD work requirement.

July 2019- Chase finds another temporary job and has been working 30 hours a week for the last 30 days. He applies for and receives CalFresh. He is meeting the ABAWD work requirement.

September 2019- Chase is laid off again, he notifies the county. The county notifies him he is no longer meeting the ABAWD work requirement and he is discontinued from CalFresh benefits. He already received the three consecutive months in the past so that is no longer an option. In the future, he is only eligible when meeting the ABAWD work requirement until the statewide time period resets on January 1, 2020.

January 2020- The “statewide clock” resets. Chase still has an ABAWD time limit. He could apply for CalFresh benefits and be eligible for another three full months of benefits without meeting the ABAWD work requirement.

WHAT HAPPENS TO THE CALFRESH HOUSEHOLD WHEN SOMEONE WITH AN ABAWD TIME LIMIT BECOMES INELIGIBLE?

Benefits are discontinued for the adult with an ABAWD time limit that is no longer eligible, but the rest of the eligible household members can continue to receive benefits. To determine the household's benefit allotment, the ineligible person's income and resources are treated just like we currently treat another ineligible household member, such as when someone is ineligible based on their immigration status.

This means:

- That person is excluded when determining the size of the CalFresh household.
- Their resources are fully counted. They would be considered when determining if a household qualifies for expedited benefits.
- That person's income is prorated when calculating the household's income.
- CalFresh benefits would not be issued for the ineligible household member.

WHAT NOTICES AND FORMS MIGHT CLIENTS RECEIVE?

Notices

[CF 377.11C- Notice of CalFresh Time Limit for Able-Bodied Adults Without Dependents](#)

- This notice will be sent to clients who are likely subject to the ABAWD time limit to inform them of the ABAWD time limit, work requirement and exemptions.

[CF XX – ABAWD Work Reminder Letter](#)

- This letter will be mailed by the 5th of every month following application or recertification to adults with an ABAWD time limit who are believed to not be meeting the work requirement or be exempt.
- It includes:
 - Reminder of work requirement
 - Exemptions
 - County contact information
 - How to report a change
- Each county will develop their own customized version to send along with a countable month notice.

[CF 377.11B- ABAWD Countable Month One & Two Letter](#)

- This letter will be sent after an individual has accrued one countable month and then again after the second countable month.
- Clients will receive this notice AND the ABAWD Work Reminder Letter in the same month.

[CF 377.11- Notice of Discontinuance for Failure to Meet the ABAWD Work Requirement](#)

- The notice is sent 10 days before the case is discontinued, once an adult with an ABAWD time limit has reached the time limit, meaning they have received three full countable months of benefits.

[CF 377.11A- Notice of Expiration of Three Consecutive Months](#)

- The notice will be sent to individuals to inform them that they are being issued the three consecutive months and the expected end date of benefits. It also contains information on how meet the ABAWD work requirement and exemptions.

Optional verification forms

[CalFresh Community Service / Volunteer Verification Form](#)

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- This document can be used to verify volunteer hours for the ABAWD work requirement.
 - Other forms of verification including a verbal statement from the agency are also accepted.

CalFresh Request for Medical/Mental Health Verification Form

- This document can be used to verify that the person is unable to work 80 hours a month based on a physical, mental or emotional condition including pregnancy and participating in a drug or alcohol treatment program. Other forms of verification are also accepted.

HOW DO WE TROUBLESHOOT CASES AND REPORT ISSUES OR TRENDS?

CalFresh Outreach workers will play an important role in helping people with an ABAWD time limit maintain their CalFresh. Additionally, statewide advocates will rely on outreach workers to elevate barriers, trends and issues in implementation. CAFB is committed to supporting outreach workers and will continue to develop other tools and trainings as needed. CAFB will host monthly calls to hear about how the implementation process is going and what successes and challenges are being encountered. If you are ever unsure about what to do with a case or want to elevate something that does not seem right please contact CAFB or the SNAP listserv.

GLOSSARY OF TERMS

15 percent exemption- This refers to a category of exemptions that are available equal to 15 percent of the statewide “at risk” ABAWD caseload. There are multiple reasons for why someone might qualify for a 15 percent exemption. *(For more information see [“What is the 15 percent exemption?”](#))*

3 consecutive months- This means the same as “consecutive months.” See below for definition.

36-month clock/period- This means the same as “Statewide clock”, “Three-year time period” and “Three-year clock”. *(See “Statewide clock” for definition.)*

ABAWD- Able Boded Adult Without Dependents, this is the official USDA term for the group of people who might be subject to the time limit.

ACL- All County Letter

CDSS- California Department of Social Services

CFAP- California Food Assistance Program, provides CalFresh benefits to immigrants who are otherwise ineligible for the federal program based on their immigration status.

Chronically homeless- Being homeless refers to someone who might be staying in a car, a shelter, a halfway house, someone else’s home for less than 90 days, or any other situation where the person lacks a regular or fixed nighttime residence. Chronic homelessness means that in addition this has happened either twice a year OR for longer than six months OR if the person is unable to meet their basic needs included but not limited to food, shelter, electricity and water. *(For more information see [“Unable to work due to chronic homelessness”](#))*

Consecutive months- This only applies to people subject to the ABAWD time limit who have regained eligibility by satisfying the work requirement for any 30 consecutive calendar days, but have subsequently stopped satisfying the work requirement. This allows the client to be given three additional months of benefits to be used consecutively. These additional months of benefits may not be issued separately throughout the 36-month period.

Countable month- A month of CalFresh benefits received by a person with an ABAWD time limit when they were not meeting the work requirement or exempt from the work requirement. This means they used one of three full months of CalFresh benefits available.

CWD- County Welfare Department

Good Cause- This is the term used to excuse a person when they were unable to meet the work requirement because of a situation outside of their control. There are specific situations in which the eligibility worker should apply good cause, clients might not know this is an option. *(For more information see [“Good Cause”](#))*

Employment & Training program- Sometimes called “CalFresh E&T” or abbreviated as E&T. Not all counties have E&T programs, currently 36 counties have a program. *(See [“Resources”](#) for the list of counties and more information on E&T programs.)*

Statewide clock- This refers to the 36-month period in which adults with an ABAWD time limit are subject to receiving benefits for three full months. The current time period is from January 1, 2017 to December 31, 2019.

Three consecutive months- An adult with an ABAWD time limit may use up their three months of CalFresh without meeting the work requirement and then be cut off benefits, when they meet the work requirements in the future they become eligible for CalFresh again. However, if they stop meeting the work requirement a second time, then they are eligible for three consecutive months of benefits. These three months are called “three consecutive months.” *(For more information see the [“Regaining Eligibility”](#) section.)*

Three-year clock- This means the same as “36-month period”, “Statewide clock” and “Three-year time period”. *(See [“Statewide clock”](#) for definition.)*

Three-year time period- This means the same as “36-month clock”, “Statewide clock” and “Three-year clock”. *(See [“Statewide clock”](#) for definition.)*

USDA- United States Department of Agriculture

Voluntary work and voluntary workfare- Unpaid or volunteer work performed at a public or private non-profit institution can be treated as workfare

Waiver- Sometimes referred to as the “ABAWD waiver.” The waiver can be for an area or the entire state and is submitted by the California Department of Social Services for approval by the USDA. The waiver allows areas that have high unemployment or that don’t have enough jobs to not have to implement the ABAWD time limit.

Workfare- is when a CalFresh recipients works without pay to receive CalFresh. *(For more information see the [“Work Requirement”](#) section.)*

RESOURCES

ABAWD Time limit

- [ACL 16-24](#) CalFresh Summary of the ABAWD time limit
- [MPP 63-410](#) Work Requirements for ABAWDs
- [7 CFR 273.24](#) Time Limit for Able-Bodied Adults
- USDA FNS [ABAWD page](#)
- CDSS ABAWD Time Limit Handbook: [ACL 18-08](#)

Employment & Training Program:

- CDSS' [page on E&T](#)
- E&T programs as of [FFY 2018](#)

Good cause regulations: [MPP 63-410.221](#)

Inter-county Transfers: [ACL 11-22](#)

Office of Refugee Resettlement: [Programs in CA](#)

[Outreach toolkit](#)

- [ABAWD time limit webinar](#)

Work registration exemptions

- [ACIN- I-01-13](#) Policies and procedures for CalFresh Work Registration
- [MPP § 63-407.21](#) Work Registration Requirements
- [7 CFR 273.7](#) Work Provisions