

From the Hotline

If you have any questions on this column or other policy and procedural material, please have your Hotline designee call the **Policy Hotline at 617-348-8478**. The questions and answers below address issues concerning student status in the TAFDC and SNAP programs. See below for information and appropriate reference materials.

- Q.** My SNAP client had been living alone but at her recent recertification interview, she reported that her 19-year-old daughter, who is a full-time college student during the school year, has just moved back home. This daughter was unemployed while at school and is currently still unemployed. Also, the daughter is not participating in a federally funded work-study program. Now that college is no longer in session, is she eligible for SNAP benefits?
- A.** No. At this time, your client's daughter does not meet the SNAP student eligibility requirements because during the school year, she did not meet the SNAP student requirements. Although she is not attending classes during the summer or winter break, she is considered "continuously enrolled" during periods of vacation or recess, until she graduates or ends her enrollment.

For more information on SNAP's continuous enrollment policy, refer to 106 CMR 362.420. For information on how to qualify as an eligible student for SNAP benefits, refer to 106 CMR 362.410.

NOTE: In the TAFDC Program, a 19-year old dependent is ineligible for cash assistance, according to 106 CMR 203.575.

- Q.** This same SNAP client who had been living alone during the school year and is now living with her 19-year-old daughter, called up later in the day to report that her daughter just found a job and will begin working **10 hours** a week over the summer as a waitress. Can I disregard her daughter's earnings?
- A.** Yes. As an ineligible student and nonhousehold member, the daughter's earnings are not considered in determining the SNAP household's eligibility and benefit level. For more information on nonhousehold members in the SNAP Program, refer to 106 CMR 361.230.
- Q.** If this same SNAP client who had been living alone but is currently living with her 19-year-old reports that her student daughter will actually begin working 20 hours per week as a waitress during the summer months, do I count the daughter's earnings?
- A.** Yes. As long as the daughter is working at least **20 hours** per week, she meets the student eligibility requirements and therefore she joins her mother's SNAP household and her earnings as a waitress are countable.
- Q.** My SNAP client's 21-year-old son has been receiving SNAP benefits as a qualifying student while living apart from his mother. During the school year, he was attending classes full-time and working 22 hours per week. At my client's recent recertification, she reported that her son has moved back home with

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her temporarily for the summer and is working full-time until he returns to school in the fall. Should I include this son in my client's SNAP household?

- A.** Yes. Since the son is no longer living apart, his separate SNAP household should be closed, and he should be added to your client's household. As a continuously qualifying student, his earnings are counted in the benefit calculation.
- Q.** My TAFDC client is 20-years old and has one child. She has started working at a summer camp, but plans to attend a local community college full-time beginning in the fall. Do I disregard her summer job earnings, even though there is no indication that the job is funded through ARRA or WIA?
- A.** Yes. As a 20-year-old, any temporary, seasonal summer employment income earned by this client between May 1, 2009 and September 30, 2009 is noncountable. For more information on summer earnings in the TAFDC Program, refer to 106 CMR 204.250(RR).

NOTE: For the SNAP Program, these earnings **may** be noncountable if ARRA or WIA-funded. Refer to Field Operations Memo 2009-27 for more details.

Field Operations Memos

Extended Unemployment Benefits

TAFDC, EAEDC and SNAP

Field Operations Memo 2009-24 A

As a result of the recently enacted American Recovery and Reinvestment Act of 2009, unemployed workers may be eligible for extended unemployment benefits.

This memo informs TAO staff about extended unemployment benefits and advises TAO staff to remind clients to apply for extensions when appropriate. However, the maximum number of weeks unemployed workers may now be eligible for benefits has been increased to 72 weeks, up from the previous maximum of 59 weeks.