

**DSS ADMINISTRATIVE LETTER NO. ECONOMIC AND FAMILY SERVICES 3-2020  
EFS\_FNS\_AL-3-2020 (Amended)**

**Food and Nutrition Services**

**TO:** County Directors of Social Services

**ATTENTION:** Food and Nutrition Services

**DATE:** March 27, 2020

**SUBJECT:** Able Bodied Adults Without Dependents (ABAWDs) exempt due to COVID-19 public health emergency (Amended)

**EFFECTIVE DATE:** April 1, 2020

**PRIORITY:** For Information and Action

**I. GENERAL INFORMATION**

On March 18, 2020 the Families First Coronavirus Response Act was signed to temporarily and partially suspend the work requirements for Able-Bodied Adults Without Dependents (ABAWD) participation in the Food and Nutrition Services (FNS) program. The suspension applies beginning April 1, 2020, through the end of the month following the month in which the COVID-19 public health emergency declaration by the Secretary of Health and Human Services is lifted.

**II. IMPLEMENTATION INSTRUCTIONS**

**A. ABAWDs AFFECTED:**

This policy only applies to ABAWD individuals that meet the following criteria:

1. An ABAWD individual that is included in a FNS Unit and currently receiving "Free months".
2. An ABAWD individual that is included in a FNS Unit and currently receiving their third "Bonus months".
3. An ABAWD individual that is included in a FNS application filed prior to the COVID-19 public health emergency declaration being lifted.

**B. EFFECT ON ABAWDs:**

ABAWDS will be exempt from work requirements for any months received between April 1, 2020 and the last day of the month following the month that the COVID-19 public health emergency declaration by the Secretary of Health and Human Services is lifted. The months received during this period will not count toward the ABAWDS 3-month time limit for the ABAWD period of January 1, 2019 to December 31, 2021

**C. NC FAST PROCESS ON MARCH 29, 2020:**

1. NC FAST has created a work non-participation evidence titled "COVID-19".

2. On the night of March 29, 2020 NC FAST will systematically enter the work non-participation evidence "COVID-19" on all ABAWDS who are currently receiving "Free months" in an active FNS case.
3. NC FAST will add the work non-participation evidence titled "COVID-19" the month after the last "Bonus month" has been received on all active ABAWDS currently in a bonus month.
4. The work non-participation evidence will have a start date of April 1, 2020 and no end date.
5. NC FAST will send a notice to all ABAWDS that have the work non-participation evidence "COVID-19" added. See ABAWD notice attached to this letter.
6. Workers do not need to take any action on active ABAWDS who are currently receiving "Free months" or "Bonus months".

#### **D. WORKER'S ACTIONS:**

Based on the application date, the worker will take the following actions for applications that contain an ABAWD:

1. Pending applications: Enter work non-participation evidence of "COVID-19" with a start date of April 1, 2020. This will exempt the ABAWD from April 1, 2020 until the end of the month following the month the COVID-19 public health emergency declaration by the Secretary of Health and Human Services is lifted. Do not enter an end date.

**Example:** Pending application with a date of application of March 12, 2020. The worker would enter work non-participation evidence "COVID-19" with a start date of April 1, 2020 and no end date. This will exempt the ABAWD starting April 1, 2020.

2. Applications taken between April 1, 2020 and the end of the month following the month the COVID-19 public health emergency declaration by the Secretary of Health and Human Services is lifted: Enter work non-participation evidence of "COVID-19" with a start date that equals the date of application. This will exempt the ABAWD from the first month of application until the end of the month following the month the COVID-19 public health emergency declaration by the Secretary of Health and Human Services is lifted. Do not enter an end date.

**Example:** Application taken on May 4, 2020. The worker would enter work non-participation evidence "COVID-19" with a start date of May 4, 2020 and no end date. This will exempt the ABAWD from work requirements starting with the first month of application.

#### **E. NC FAST ACTIONS WHEN THE EMERGENCY DECLARATION IS LIFTED.**

1. When the COVID-19 public health emergency declaration by the Secretary of Health and Human Services is lifted, NC FAST will systematically enter an end date on all non-participation evidence titled "COVID-19", including those entered by the worker. The end date will be the last day of the month following the month the emergency declaration is lifted.

**Example:** The COVID-19 public health emergency declaration by the Secretary of Health and Human Services is lifted June 10, 2020. The end date entered by NC FAST will be July 31, 2020.

2. ABAWDs that were receiving in their first or second “Free months” on March 31, 2020: After NC FAST systematically enters the appropriate end date, the ABAWD will be evaluated by the system and the remainder of their three “Free months” will be issued as appropriate. Adverse Actions will be issued during the third “Free month” per normal policy procedures.

**Example:** ABAWD that was receiving in their second “Free month” on March 31, 2020. NC FAST enters an end date on the work non-participation evidence of July 31, 2020. The ABAWD will receive their third “Free month” in August 2020. The system will send an Adverse Action in August to terminate assistance per normal policy procedures.

3. ABAWDs that were receiving in their third “Free month” on March 31, 2020: After NC FAST systematically enters the appropriate end date, the ABAWD will be issued a notice of Adverse Action to terminate their assistance at the end of the month following the month the emergency declaration is lifted.

**Example:** ABAWD that was receiving in their third “Free month” on March 31, 2020. NC FAST enters an end date on the work non-participation evidence of July 31, 2020. NC FAST will send the ABAWD an Adverse Action in July to terminate assistance per normal policy procedures.

4. ABAWDs that have received all of their three “Bonus months” on March 31, 2020 or later: After NC FAST systematically enters the appropriate end date, the ABAWD will be issued a notice of Adverse Action to terminate their assistance at the end of the month following the month the emergency declaration is lifted.

**Example:** ABAWD that has received all three “Bonus month” as of March 31, 2020. NC FAST enters an end date on the work non-participation evidence of July 31, 2020. Because the individual has used their “Bonus months” prior to receiving the COVID-19 exemption, NC FAST will send the ABAWD an Adverse Action in July to terminate assistance per normal policy procedures.

### III. EFFECTIVE DATE

This policy is effective April 1, 2020 for all applications, recertifications, and changes in situation. Submit any questions regarding this policy to Operational Support Team (OST) at [DSS.Policy.Questions@dhhs.nc.gov](mailto:DSS.Policy.Questions@dhhs.nc.gov).

Sincerely,



David Locklear, Deputy Director  
Economic and Family Services Section  
DL/rc

**Attachments (1):**  
ABAWD Notice