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TO: Subscribers

SUGGESTED DISTRIBUTION: Commissioners, TA Directors, SNAP Directors,
Employment Coordinators, Staff Development
Coordinators

FROM: Jeffrey Gaskell, Assistant Deputy Commissioner
Employment and Income Support Programs

SUBJECT: TA, SNAP Budgeting of AmeriCorps State and National, AmeriCorps NCCC,
and AmeriCorps VISTA payments.

EFFECTIVE DATE: Immediately

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The purpose of this GIS is to remind social services districts (districts) of the policy and procedures for budgeting AmeriCorps State and National, AmeriCorps National Civilian Community Corps (NCCC), and AmeriCorps VISTA payments for applicants and recipients of TA and SNAP. This reminder is being issued in response to districts' requests for clarification of how benefits received under AmeriCorps are treated for SNAP and TA budgeting purposes. Information to explain how documented hours of participation under these programs may be reported towards TA and SNAP work participation, including meeting the additional requirements for Able-Bodied Adults Without Dependents (ABAWDs) is also included.

The budgeting of benefits received under AmeriCorps varies depending on whether the individual is serving with AmeriCorps State and National, NCCC, or AmeriCorps VISTA. All of the aforementioned programs are administered by the Corporation for National and Community Service (CNCS). However, AmeriCorps State and National, NCCC, and AmeriCorps VISTA are governed by different legislation with different budgeting requirements.

SNAP Budgeting of AmeriCorps Income

AmeriCorps State and National Program

The AmeriCorps State and National Program was authorized by the National and Community Service Act of 1990 (NCSA), 42 U.S.C. § 12501 *et seq.* NCSA language and United States Department of Agriculture (USDA) guidance both state payments received under AmeriCorps State and National Program are to be excluded from gross income calculations when determining the amount of or eligibility for SNAP benefits -- **i.e., the member's SNAP eligibility should not be affected by their AmeriCorps living allowance.**

AmeriCorps VISTA Program

The AmeriCorps VISTA Program was authorized under Title 1 of the Domestic Volunteer Service Act of 1973 (DVSA) (P.L.93-113). As a State option under the Food Stamp Authorization Act of 2002, payments issued to volunteer members of VISTA were excluded as income for purposes of determining the amount of or eligibility for SNAP benefits. USDA later determined that these payments must be counted as earned income for SNAP if the VISTA volunteer was not receiving temporary assistance or SNAP benefits when joining VISTA (See [05-ADM-14](#)). To clarify, for the purposes of SNAP:

- AmeriCorps VISTA members who are in receipt of SNAP benefits **prior to** enrolling in the VISTA program must have their VISTA payments excluded from their household's gross income calculation when determining eligibility for SNAP benefits. Temporary interruptions in SNAP participation must not alter the exclusion of AmeriCorps payments once an initial determination has been made, 7 CFR 273.9(c)(10)(iii). Per 05-ADM-14, temporary interruptions have been defined as 'less than six months'.
- AmeriCorps VISTA members **not** receiving SNAP benefits, who apply for SNAP **after** joining the VISTA program, must have their VISTA payments **included** as earned income when determining eligibility for SNAP and the amount of their household's SNAP benefits. That is, if an individual applies for SNAP **after** becoming an AmeriCorps VISTA member, their VISTA income must be budgeted as earned income.

TA Budgeting of AmeriCorps Income

AmeriCorps State and National Program and AmeriCorps National Civilian Community Corps (NCCC)

For AmeriCorps State and National Program, and AmeriCorps NCCC participants, **living allowances (stipends) are treated as earned income for TA purposes**, and the general earned income disregards, or student earned income disregards are applied when appropriate.

AmeriCorps VISTA

AmeriCorps VISTA payments received by applicants for or recipients of temporary assistance who are volunteers under part A of title I of Public Law 93-113 (VISTA) must be exempted and disregarded as income and resources in determining eligibility and standard of need; provided, however, that all of the VISTA payment is to be counted as income when the director of CNCS, (formerly ACTION agency), determines that the value of all such payments, adjusted to reflect the number of hours such volunteers are serving, is equivalent to or greater than the minimum wage.

Allowances received for child care are exempt from consideration as income for TA purposes to the extent the funds are used to meet child care expenses necessary for participation in the AmeriCorps State and National, NCCC, and VISTA programs. **Additionally, the basic health insurance policy, child care services, auxiliary aid and services to individuals with disabilities, and the national service award are treated as in-kind benefits, and are not counted.**

Reporting Hours of Participation for Federal Reporting:

Districts are reminded to report the hours of participation in AmeriCorps into WTCMS or NYC systems, as appropriate.

If the income from an individual's participation in AmeriCorps is budgeted as earned income, documentation is required and the hours of paid participation should be entered on ABEL as subsidized public or subsidized private employment. Districts should also establish a subsidized public or private employment enrollment on WTCMS/NYC systems at least until the earned income and hours of paid participation have been budgeted on ABEL. The weekly average number of hours may be used to enter scheduled/projected hours into the WTCMS or NYC systems for up to 6 months or until a change in the number of hours of paid participation is reported, whichever occurs first (see 08 ADM-07 for additional information for reporting hours of participation for households with dependent children and [07 ADM-08](#) for additional information for reporting hours of participation for members of a household without dependent children).

When the income from AmeriCorps is not budgeted on ABEL, districts should enter an enrollment under community service on WTCMS/NYC systems. Documentation of the actual hours of participation must be obtained monthly and entered on WTCMS/NYC systems by the 15th of the following month to report the hours of participation towards participation rates or compliance with the requirements for ABAWD.