

INTERPRETIVE MEMO

3SquaresVT Rule Interpretation

Procedural Instruction

This memo remains effective statewide until it is specifically superseded – either by a subsequent memo or by a contradictory rule with a later date.

Please file in your manual facing the page indicated below.

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This memo: is new Replaces one dated _____

Compensated Work Therapy - FNS Clarification

Compensated Work Therapy (CWT) payments are counted as earned income for 3SquaresVT.

CWT is a therapeutic program of vocational and rehabilitative services under the Dept. of Veterans Affairs. Unemployed, or underemployed, veterans are placed in a real work environment and are paid for their work via payments from the VA or through the employer. These experiences help veterans develop work skills for their return to the community's regular work force.

While the VA considers CWT payments to be a donation and thus, excluded from income for its purposes, the payments do not meet the SNAP definition of a donation found at 7 CFR 273.9(c)(12). Based on 7 CFR 273.9(c), there is no regulatory basis for excluding these payments from countable income for SNAP purposes.

Regulations at 7 CFR 273.9(b)(1)(iii) also provide that an allowance paid to participants in a training or rehabilitative program shall be considered earned income.

MBA
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