

# Desk Guide: TLFA Work Requirements for Food Assistance

## NEXT STEP FOR ALL CLIENTS:

Call your local MDHHS office for more information at **1-844-464-3447**

MDHHS can help with:

- Determining exemptions
- Outlining next steps to fulfill work requirements
- Connecting to employment programs

## Frequently Asked Questions for Time Limited Food Assistance (TLFA)

### What is Time Limited Food Assistance (TLFA)?

Also known as “work requirements” for food assistance, Time-Limited Food Assistance (TLFA) is a policy for individuals aged 18-64 that limits Food Assistance Program (FAP/SNAP) benefits to three months within a three-year period (January 1, 2025 - December 31, 2027), unless they meet work requirements. “TLFA individuals” is often used to refer to people who are subject to (and therefore, not exempt from) these new requirements.

### Is TLFA considered “work requirements” for food assistance?

Yes. When communicating with clients, refer to these as “work requirements for food assistance” rather than TLFA to remain consistent and align language currently utilized by most of the general public. Keep in mind that there are still two separate types of food assistance work requirements: general work requirements and TLFA work requirements. Under the general work requirements, individuals who are already working may not voluntarily quit a job of 30 hours or more per week without good cause or voluntarily reduce their hours of employment below 30 hours per week without good cause.

### Is an exemption the same thing as a “deferral” or an “exclusion”?

Yes — “exemption,” “deferral,” and “exclusion” all refer to individuals who do not need to fulfill new work requirements to receive food assistance.

### Who is subject to the TLFA/new work requirements policy?

All SNAP participants ages 18-64 are subject to the new work requirements policy unless they meet an exemption or live in an area of the state covered by a TLFA waiver. (See “Exemptions” below for the full list.) Note: This age range has increased as a result of H.R. 1.

### Why is Michigan implementing TLFA now?

Since the pandemic, SNAP participants in Michigan were not subject to work requirements until very recently. Due to H.R. 1, also known as the One Big Beautiful Bill Act, changes were made to the TLFA waiver and some counties in Michigan are now required to implement SNAP work requirements. Beginning Dec. 1, 2025, all locations in Michigan not exempted by a waiver implemented TLFA (work requirements) under the new federal guidelines established in H.R. 1. Individuals in Kent County (excluding Grand Rapids), Livingston and Oakland (excluding Oak Park & Pontiac) implemented TLFA work requirements as of October 1, 2025.

# Desk Guide: TLFA Work Requirements for Food Assistance

## Work Requirement Details

### How can clients meet the work requirement?

- **Employment:** Work an average of at least 20 hours per week or 80 hours/month in unsubsidized, self and/or in-kind employment, or receive monthly average earnings of at least 20 hours/week multiplied by the federal minimum wage.
- **Employment and training program:** Participate for an average of 20 hours per week each month in an approved employment and training or workfare program with Michigan Works! (if available in their location) or a veteran training program through the Department of Labor or Department of Veteran Affairs.
- **Self-initiated community service:** Participate in self-initiated community service by volunteering at a nonprofit organization. Note: Volunteer opportunities must fulfill requirements. See the question below for more information.

### What does “work” include?

Under the “employment” option for fulfilling requirements, “work” may include:

- Work in exchange for money, including self-employment
- Work in exchange for goods and services (in-kind)
- Volunteer work at an approved nonprofit organization. This is referred to as self-initiated community service.

### Can work program hours (like Michigan Works!) be combined with an individual's work hours?

Yes — excluding workfare, these hours may be combined with individual work to meet the 80 hours/month requirement.

### How can a client use self-initiated community service (volunteering) to meet work requirements?

To meet the requirement, the number of volunteer hours must equal the SNAP household's monthly benefit amount divided by the state minimum wage. Volunteer hours must be completed at a nonprofit agency, and MDHHS offices may maintain a list of nonprofit organizations willing to accept volunteers. Clients interested in using volunteer opportunities to fulfill requirements should call their local MDHHS office to determine what type of volunteer work and nonprofits meet this requirement. Direct clients to visit the Time Limited Community Service Activity page on MiBridges to see approved organizations — they will also need to sign up as a Registered User.

# Desk Guide: TLFA Work Requirements for Food Assistance

## What are the TLFA reporting requirements?

Clients must notify their local MDHHS office during any month their work hours fall below 80 hours a month. Reporting requirements are different depending on whether the client's FAP group is a Simplified Reporting (SR) group or a Change Reporting (CR) group:

- Simplified Reporting (SR): The group is required to report certain changes to the department by the 10th day of the following month, or the next business day if the 10th day falls on a weekend or holiday.
- Change Reporting (CR): The group is required to report changes to the department within 10 days of the date when the change becomes known to the group

Clients can report these changes by calling their local MDHHS office at 1-844-464-3447.

## Exemptions

### Who is exempt / deferred from TLFA?

An individual can be deferred from TLFA participation for several reasons:

- Are under age 18 or 65+
- Live in one of these exempt locations:
  - Exempt Counties: Alcona, Alger, Arenac, Cheboygan, Iosco, Iron, Luce, Mackinac, Montmorency, Oceana, Ogemaw, Oscoda, Presque Isle, Roscommon, Schoolcraft
  - Exempt Cities: Bay City, Detroit, Eastpointe, Flint, Jackson, Saginaw
- Are in a FAP group that includes an individual under age 14
- Are responsible for the care of a child younger than age 6 or another person who needs help caring for themselves
- Already work at least 30 hours a week or earn weekly wages of at least \$217.50
- Receive unemployment benefits; have applied for unemployment benefits (including those appealing a denial); or receive disability benefits (unable to work for more than 20 hours per week)
- Are unable to work because of a physical or mental health reason (Note: Verification from a physician or mental health professional may be needed.)
- Attend college or a training program at least half time (Note: College students are subject to other eligibility rules)
- Meet work requirements through another program, such as the Family Independence Program (FIP); however, eligibility and deferrals may differ across programs
- Are in an inpatient or outpatient drug or alcohol addiction treatment program (excluding AA or NA)
- Are pregnant
- Are Native American/Indigenous

# Desk Guide: TLFA Work Requirements for Food Assistance

---

## Which areas of the state are exempt to TLFA under the current waiver?

- Exempt counties: Alcona, Alger, Arenac, Cheboygan, Iosco, Iron, Luce, Mackinac, Montmorency, Oceana, Ogemaw, Oscoda, Presque Isle, Roscommon, and Schoolcraft
- Exempt cities; Bay City, Detroit, Eastpointe, Flint, Jackson, and Saginaw

---

## Do any previously allowed exemptions no longer apply?

Yes — groups no longer exempt from work requirements include:

- Veterans
- Individuals experiencing homelessness
- Foster care youth who have aged out of foster care

However, many individuals in these categories may meet an exemption for other reasons. Be sure to direct clients to call their local MDHHS office to determine exemption details (1-844-464-3447).

---

## Who determines exemption?

MDHHS will evaluate and determine an individual's exemption status. Outreach teams will not be able to determine exemption; they will only help explain the TLFA in more detail. Be sure to direct clients to call their local MDHHS office to determine exemption (1-844-464-3447).

---

## Are there other reasons that a client could be exempt, besides those listed above?

Yes, depending on the situation. Clients who believe they have a "good reason" should contact their local MDHHS office to explain the situation and determine a potential exemption beyond those listed (1-844-464-3447). This could include circumstances beyond their control, such as personal illness, illness or death of a household member, problems with transportation, lack of childcare, a household emergency, or more.

---

## What is MDHHS's screening or verification process to determine exemptions?

Specialists document an individual's exemptions in a case file, but they do not need to request verification or documentation from the client unless the qualification is deemed questionable. In those rare occasions, specialists will reach out to clients for documentation.

# Desk Guide: TLFA Work Requirements for Food Assistance

## Timeline

### **What happens if a non-exempt client does not meet work requirements? When will they lose SNAP benefits?**

TLFA individuals who have not fulfilled work requirements and are not exempt can only receive snap benefits for up to three months within the three-year period (January 1, 2025 - December 31, 2027). Note that Kent County (excluding Grand Rapids), Livingston and Oakland (excluding Oak Park and Pontiac) implemented TLFA work requirements as of October 1, 2025.

The first time a client does not meet TLFA work requirements without a good reason, they will earn one “countable month.” A countable month is a month during which a client still receives SNAP benefits even though they are not meeting work requirements.

Once an individual has received their third countable month, they will either become a disqualified group member, or if they were the only group member their food benefits will close. After receiving three countable months, an individual is eligible to regain food assistance by meeting one of the following TLFA work requirements within any 30-day period after their food assistance benefits ended: They can either work 80 hours, or complete previously identified self-initiated community service hours. Food assistance may also be regained if the individual meets an exemption.

### **How long will a client lose SNAP benefits if they do not meet TLFA work requirements?**

Once a client has received a third countable month of not meeting TLFA work requirements, they will no longer be eligible for food assistance benefits until they meet one of the conditions to regain eligibility. If the individual does not regain eligibility prior to January 1, 2028, they would be eligible to reapply then as that will be the start of a new three-year period.

### **Can a client receive benefits again if they lose eligibility?**

Yes, but they will need to complete 80 hours of work or work activities in a 30-day period to receive SNAP benefits again. Direct clients to contact their local MDHHS office (1-844-464-3447) if they are interested in regaining benefits and they can explain the reapplication process. Clients may need to reapply for SNAP benefits. They can also become eligible again if they are excused from the work requirements listed above.

# Desk Guide: TLFA Work Requirements for Food Assistance

---

## **If a TLFA (non-exempt) individual receives benefits during their three-month window but at a later date gets a job, when can they reapply to receive SNAP benefits?**

Anyone can still regain SNAP eligibility at any time, as long as they have met the work requirement within any 30 day period after their last benefit month

Individuals who have received three countable months may regain food assistance eligibility as long as they have worked 80 hours or completed their required number of self-initiated community service hours within a 30-day period after their food assistance benefits ended. Individuals meeting a deferral do not need to wait 30 days.

## Next Steps

---

## **What are next steps for clients that have received a notice about the work requirements, but think they may meet an exemption?**

If the client has received notice that they are required to meet either the general or TLFA work requirements and they feel they meet an exemption:

1. Instruct them to call their local MDHHS office at 1-844-464-3447 to discuss exemptions, determine next steps for potential work requirements, and avoid benefit disruption.
2. Also instruct them to visit the MI Bridges website to make sure their information is up to date: [michigan.gov/MIbridges](https://michigan.gov/MIbridges). This will ensure they receive accurate information from MDHHS.

---

## **What should a TLFA (non-exempt) individual do if they are concerned they won't be able to meet the work requirement?**

Clients should call their local MDHHS office at 1-844-464-3447 if they think they will not be able to meet the work requirements. A representative will help determine options.

---

## **How can a client find out if they meet exemptions?**

Clients should call their local MDHHS office at 1-844-464-3447. A representative will evaluate their unique situation and see if they meet exemptions and, if not, what next steps they will need to take.

---

## **How will clients find out about this change?**

Clients subject to these changes will receive a Work Requirement Notice letter from MDHHS via mail that outlines this change. Clarify that this letter does not mean they will immediately lose SNAP benefits — they need to call their local MDHHS office at 1-844-464-3447 to determine any potential exemptions and next steps.

# Desk Guide: TLFA Work Requirements for Food Assistance

---

## How can clients receive employment help from MDHHS and Michigan Works?

If clients would like help finding training or a job, they should contact their local MDHHS office and ask about the **FAP Employment and Training (FAE&T) Program**. While this program is not offered by all Michigan Works! Agencies (MWAs), it helps clients in many areas participate in employment and training activities that will improve their ability to get and hold a job, as well as increase self-sufficiency.

MDHHS determines a client's eligibility for this program and then refers them to the MWAs that oversee the program. Employment services and training activities available through the local MWAs include:

- Job search
- Workfare (Community Service)
- Work readiness (resumes, applications, interviews)
- Educational and training programs
- Basic literacy
- Vocational training

MWAs can also help with transportation, clothing, and education assistance needed to participate in this program. For more information on FAE&T, clients can contact their local MDHHS office (1-844-464-3447) to be referred, or directly contact Michigan Works! at 800-285-WORKS (9675). They can also find their local MWA location by zip code at [michiganworks.org](http://michiganworks.org).

---

## Do clients qualify for free legal help related to this change in work requirements?

If a client does not agree with a decision MDHHS makes to deny, reduce, or terminate benefits, or for failure to act with reasonable promptness, they have the right to request a hearing. Some clients may qualify for free legal help. To find help, they can call 888-783-8190 or visit [michbar.org/public\\_resources/legalaid](http://michbar.org/public_resources/legalaid).

More information on requesting a fair hearing is included in the client's letter from MDHHS, or can be obtained from MDHHS by calling 1-844-464-3447.

---

## How can clients make sure they are receiving up-to-date information on this from MDHHS?

Encourage clients to keep their info up to date with MDHHS by visiting the MI Bridges website: [michigan.gov/MIBridges](http://michigan.gov/MIBridges). There, they can check their eligibility status and manage their account. If they have not already created an account there, encourage them to do so. This will help ensure that they are properly screened and/or receive any correspondence from MDHHS on whether they will be impacted by the work requirement changes.