ABAWD Desk Aid

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ABAWD

KEESM 2520, 2521, 2522, 2523, 2527, 9122.1

WHO IS AN ABAWD?	A person who is able-bodied , age 18 through 49 , and has no dependents (child/unborn), or has no minors in their Food Assistance household.		
	The month a person turns 50, they become exempt from the ABAWD provisions. The month following the month a person turns 18, they become subject to the ABAWD provisions unless they are receiving TANF. KEESM 2520		
WHO IS EXEMPT FROM	The following are exempt:		
ABAWD PROVISIONS?	✓ A person under 18 or age 18 and still receiving TANF		
	✓ A person age 50 or older		
	✓ A person medically certified to be unfit for employment		
	✓ A person who has to care for a dependent child <u>or</u> is living in the Food Assistance household with a person under age 18. This applies even if the person under 18 is not getting food assistance, for example a child who is coded DI for the parent's failure to provide an SSN.		
	✓ A woman who is pregnant, including the father of the unborn		
	 A person needed to care for an incapacitated household member 		
	✓ A person getting unemployment compensation		
	 A regular participant in a drug or alcohol treatment and rehabilitation program 		
	✓ A student enrolled at least half time KEESM 2521		
BENEFIT PERIODS	An ABAWD can receive food assistance benefits for only 3 months out of a set 36 month period.		
	 The current period began October 01, 2013 and will end September 30, 2016. 		
	 The 3 months don't have to be consecutive, and a prorated month does not count as one of the 3 months. KEESM 2520 		

ABAWD WORK REQUIREMENTS	To be employed an average of 20 hrs/wk earning at least minimum wage, OR Participating in WIA/TAA/other approved employment and training program for 20 hrs/wk or more KEESM 2520(1) and (2)
REVIEW REQUIREMENTS	An ABAWD is to be set up with a 12 month review period, with an alert set for the 3 rd month.
SEPA CODING	An eligible ABAWD is coded IN .
	An ineligible ABAWD is coded DI if the case is left open for others in the household.
JOPR CODING	An eligible ABAWD is coded AB MD for the food assistance program work requirements for 3 months. An eligible ABAWD working 20-29 hours is also coded AB MD . Also see JOPR Coding Chart on page 8.
PRAP CODING	AB means a person is an ABAWD Code all ABAWD's on PRAP with AB!
ABAWD STATUS WITH NO TIME LIMITATIONS	A person working, at least 20 hours per week (averaged monthly), and earning, at least minimum wage, or participating in and complying with a WIA/TAAA/other approved employment and training program for 20 or more hours per week. KEESM 2520(1) and (2)
GOOD CAUSE	Good cause for working fewer than 20 hours may be granted if an ABAWD would have worked an average of 20 hours per week but missed some work for reasons beyond the individual's control. Examples of good cause: • illness of another household member requiring the presence of the member, • a household emergency, or • the unavailability of transportation. Other issues might also be good cause for missing some work. The key to determining good cause is to establish that it is only a temporary situation. KEESM 2520(1)
SIMPLIFIED REPORTING REQUIREMENT	Households containing ABAWD's meeting the ABAWD 20 hour work requirement of 2520 (1), must report any changes in work hours that brings the ABAWD individual below 20 hours a week, averaged monthly. KEESM 9122.1 (2)

REGAINING ELIGIBILITY	A person denied eligibility can regain food assistance benefits (within the 36 mo. period) if, during a 30 day period, they:	
	 ✓ work 80 or more hours earning, at least, minimum wage; or ✓ participate and complying with a WIA/TAAA/other approved employment and training program for 80 or more hours. 	
	A person would remain eligible if employment continues at minimum wage or participating and complying with WIA/TAA/other approved employment training program at 20 hours or more per week. KEESM 2522	
ONE-TIME THREE MONTH EXTENSION	A person who regains eligibility as stated above and then is no longer meeting the work requirements, can be eligible for 3 more consecutive months of food assistance. This period begins on the date an individual first notifies the state of the lost job. A prorated month does not count as one of the 3 months. KEESM 2523	
	If a case has been closed, an application would be required.	
CHANGES IN STATUS	The change from an ABAWD - Not Meeting Work Requirement to a Non - ABAWD or an ABAWD - Meeting Work Requirement is effective the month the change is reported.	
	Example: A woman and her boyfriend are receiving food assistance as ABAWDs - Not Meeting Work Requirements. Their three months are November - January. On December 28 th , she reports she is pregnant. Both she and her boyfriend (father of the unborn) change from ABAWDs - Not Meeting Work Requirements to Non -ABAWDs effective December (the month of report). The case record would be updated to show each had used only one of their three months ABAWD eligibility.	
	The change from a Non - ABAWD or an ABAWD - Meeting Work Requirement to an ABAWD - Not Meeting Work Requirement is effective the month following the month the change is reported.	
	Example: An unemployed TANF/food assistance recipient is receiving for herself and her unborn. She reports on February 5 th , that she miscarried. She would change from a Non - ABAWD to an ABAWD effective March (month after report). If she had not already received 3 months as an ABAWD - Not Meeting the Work Requirement, her three months would be March, April and May. KEESM 2527	

Completing the Tracking Form

Example 1: Julie Ford applied for Food Assistance benefits on October 17, 2013. She lives with her disabled husband. She is 43 years old and lost her job 3 months ago and is currently looking for work. You approve her application on Oct. 17 and set a WOAL for January to check her ABAWD status. Remember to code "AB" on the PRAP screen.

In late November, she calls and says she has not had any luck finding a job and wants help getting a job. In December, she works with DCF and participated in an approved employment training program at 20 hours or more per week. In January, she starts a new job working 30 hours a week. She remains coded "AB" on the PRAP screen.

See below: Julie has used 1 month of her time limit of 3 ABAWD months.

STATE OF KANSAS DEPARTMENT FOR CHILDREN AND FAMILIES ECONOMIC & EMPLOYMENT SERVICES

ES-4312 10-13

ABAWD ELIGIBILITY TRACKING FORM

CASE NAME:	Julie Ford	CASE NUMBER	:
NAME OF ABA different)	WD (If		

	OCTOBER 2013 – SEPTEMBER 2016				
MONTH	STATUS	MONTH	STATUS	MONTH	STATUS
10/13		10/14		10/15	
11/13	A	11/14		11/15	
12/13	W	12/14		12/15	
1/14	W	1/15		1/16	
2/14		2/15		2/16	
3/14		3/15		3/16	
4/14		4/15		4/16	
5/14		5/15		5/16	
6/14		6/15		6/16	
7/14		7/15		7/16	
8/14		8/15		8/16	
9/14		9/15		9/16	

Form Coding:

A = Non-Prorated Month countable toward the time limit of 3 ABAWD months

 \mathbf{E} = Fixed 3-Month Extension Period

W = Month Meeting Work/Training Requirement

Example 2: Bill applies for food assistance on January 7, 2014 and received his 3 ABAWD months. The prorated month of January does not count towards the ABAWD months. His case closed the end of April. See below ABAWD months.

On September 12, 2014 Bill applies for food assistance. He has been working as a mower for a landscaping company. They laid him off because mowing season is over. He has used his 3 ABAWD months and is eligible for a 1 time 3 month extension if he has worked 80 hours since using his ABAWD months. He verifies that he has been working 40 hours a week from June through August. He is eligible for the extension for October – December. The prorated month of September does not count towards the extension. His case will close the end of December 2014. See below Extension months.

On April 8, 2015 Bill applies for food assistance. He is not eligible for food assistance because he has used all of his ABAWD months; unless he is exempt, or he is working in an approved training program for 20 hours a week. He verifies he is working 25 hours a week. As a Simplified reporter, he must report if his hours go below 20 hours. See below he is meeting work requirements for ABAWD. Remember to check to see that Bill is coded "AB" on the PRAP screen. He is an ABAWD when using ABAWD months and also when working 20 or more hours.

STATE OF KANSAS DEPARTMENT FOR CHILDREN AND FAMILIES ECONOMIC & EMPLOYMENT SERVICES

ES-4312 10-13

ABAWD ELIGIBILITY TRACKING FORM

CASE NAME:	Bill Shepard	CASE NUMBER:	
NAME OF ABA different)	WD (If		

OCTOBER 2013 – SEPTEMBER 2016					
MONTH	STATUS	MONTH	STATUS	MONTH	STATUS
10/13		10/14	E	10/15	
11/13		11/14	E	11/15	
12/13		12/14	E	12/15	
1/14		1/15		1/16	
2/14	A	2/15		2/16	
3/14	A	3/15		3/16	
4/14	A	4/15	W	4/16	
5/14		5/15		5/16	
6/14		6/15		6/16	
7/14		7/15		7/16	
8/14		8/15		8/16	
9/14		9/15		9/16	

Form Coding:

A = Non-Prorated Month countable toward the time limit of 3 ABAWD months

 \mathbf{E} = Fixed 3-Month Extension Period

W = Month Meeting Work/Training Requirement

JOPR Coding For Food Assistance

Revised 10/14

All consumers with a SEPA participation code of **IN** for food assistance must be coded on **JOPR** in order for benefits to be approved.

JOPR JOB PROGRAMS USER ID WORKER 1 010413 14:06 CASE NAME: JONES, KANSAS CASE NUMBER: 00010450 MONTH: 1013 PRIORITY: WK PGM PART WORK-ALLOW NON-COMP KSCARES RSN VR PEND REFER COMP CWEP OTHR CODE DATE CURR SANC **REL PGM** NAME 1 2 3 4 5

- **PRIORITY** There are only two options: 01 for TANF and 99 for Food Assistance. All food assistance only cases with mandatory recipients are priority 99. You may enter the 99, but you are not required to. If the field is left blank, the system will default to 99 when updated. If there are mandatory individuals for TANF and Food Assistance, TANF 01 priority takes precedence.
- 1 RSN (Reason) -This field is for codes that identify unique characteristics about consumers.
- **VR** (Verification) As with all other screens in KAECSES, verification coding depends on the type of verification used.
- **3 WK PGM REFER** (Work Program Referral) Currently, the three appropriate codes for this field are: **EV** (Exempt Volunteer), **EX** (Exempt), or **MD** (Mandatory).
- **NON-COMP** (Non-Compliance) The CODE and DATE fields must be completed if a penalty is assessed.

CODE: This will be **W1** for 1st work penalty (3 mo.), **W2** for 2nd work penalty (6 mo.), **W3** for 3rd work penalty (12 mo.) and **W4** for 4th work penalty (10 years) for TANF and food assistance recipients. *(Note: the **E1-4** potential employment penalty codes for open FA cases only are on the **PRAP** screen.)

DATE: Enter the date that the penalty begins. It should never be removed unless it is later determined to be in error. If another penalty is assessed, that penalty and date is added.

5 **KSCARES CURR SANC** (Current Sanction) - This is populated if the **CURR SANC** (Current Sanction) field is completed on **PASS** in KSCARES.

JOPR Reason Codes

KEESM 3200

KEESM 3200				
Food Assistance				
RSN(Reason)	Wk Pgm Ref	Description		
AB	MD	ABAWD not meeting ABAWD work requirements (getting their 3 months) ABAWD working 20-29 hours a week ABAWD participating in approved training program for at least 20 hours a week		
AD	EX	A person in a drug addiction or alcoholic treatment and rehabilitation program A person cooperating with outpatient treatment plans		
AG	EX	Children who are under 18, who are not emancipated, and who are without HS or GED diploma A person age 60 or older		
CU	EX	A parent or other caretaker caring for a child under 6 If two parents are in the home, they are to decide which one is to have this exemption		
EM	EX	A person employed 30 hours per week or receiving weekly earnings equal to federal minimum wage multiplied by 30 hours NOTE: Includes ABAWDs working 30 hours per week or receiving weekly earnings equal to federal minimum wage multiplied by 30 hours		
HS	EX	A person 18 years or up through the month turning 19, if working towards the attainment of a high school diploma or GED		
IN	EX	A person with an illness, injury, or incapacity, expected to last at least 30 days, which substantially limits employment A statement from a qualified practitioner is needed		
NA	MD	A person with no reason to be exempt from working		
NC	EX	A person with a verified need to care for an incapacitated member of the home		
PA	EX	A person subject to and complying with TANF work requirements		
ST	EX	A student enrolled at least half-time		
UC	EX	A person receiving UC or approved to receive UC		

ABAWD Questions and Answers – Part 1 - 10/8/13

Changes After Case Closure

1. Q: An ABAWD case is closed 12/31/13 for not meeting the work requirement or being exempt. On December 20th, the client calls to report that he was injured in a car accident and cannot work. Does he have to reapply for benefits?

A: If the change occurs in the month of closure, then the client does not have to reapply. We can just reopen the case and make the appropriate change. Since he is disabled, change the ES-4308 to reflect he has not used one of his 3 months of time limited benefits in December. If the change is reported in any month following the month of closure, then a new application is required. He has used his 3 ABAWD months and must be exempt or meet the work requirements to get benefits.

2. Q: An ABAWD case closes 12/31/13 for not meeting the work requirement or any exemptions. In late December the client calls to report that her child under age 18 has returned to the home. What happens?

A: This is like question 1 above. Since the child has returned to the home, she becomes an exempt ABAWD effective the month the change was reported. So December becomes an exempt ABAWD month, not one of her 3 months of time limited benefits. Revise the ES-4308. The case would be reopened for January. If the change is reported in January, the client must reapply.

One-Time Three Month Extension

3. Q: How far back do we go to determine if the person has worked the 80 hours and is entitled to the 3 month extension? For example and ABAWD case closes the end of December 2013. They reapply in March of 2014. They report they worked 80 hours in November of 2013. Are they eligible for the 3 month extension?

A: There are two questions here. In the case of the example, they are not entitled to the extension as they have to work the 80 hours AFTER they have lost ABAWD eligibility. Since they worked the 80 hours during their 3 months of time limited benefits, they would not be eligible unless they are now meeting the work requirement or otherwise exempt. As to how far do you have to go back to see if someone worked the 80 hours, you would look at the time period after they lost ABAWD eligibility, which would be January 1, 2014 since they have to have been denied eligibility first before being assessed for a 3 month extension.

Exemption for Disability

4. Q: If an ABAWD applies and self-declares that they are unfit for employment I agree that eligibility staff should use prudent person if the unfitness is obviously visible. My question is wouldn't the worker go ahead and determine eligibility as the ABAWD can get FA for 3 months? They would establish eligibility if possible and then request the ES-4309, pend to purple for the client to provide that form completed by their Dr. in 10 days (or by the end of the 3 month exemption for FA benefits to continue)? If the form is not completed and provided the purple team would close for ABAWD reason? Would the purple team have to close the FA for not providing that documentation (is it mandatory for eligibility) or would the case remain open for the case or remove the individual after 3 months of eligibility? If the form is received the purple team would determine if it meets the exemption criteria and update KAECSES as required?

A: If the unfitness for employment is not visible, then the client must provide the agency with a completed ES-4309 or a written statement from a medically-qualified source which supports the extent of the claimed disability. They really have until the end of their 3 time limited months of eligibility to provide the documentation, so the case (or person) would not be closed if the form is not returned within 10 days. Of course, the earlier they provide the form and we can establish they are exempt, the better. So an alert would still be set to close at the end of the 3 months if the ES-4309 or written statement is not returned and they are not otherwise exempt or meeting the work requirement. In addition, there are no funds to pay for either the ES-4309 or a written statement to be completed, so it is the responsibility of the client.

5. Q: I had written down that if a prudent person could not tell if there was a disability, and we had no doctors statement in the file or nothing from VR that would verify a disability, we could have the client fill out the ES 3900 – Tell us if you have a Disability. In looking at the SOC and the Implementation Memo, there is nothing in there that states this could be used. So my question is once this is filled out, is it ok to approve, and go until next review or IR, would we only use this for approval and then give them 30, 60, 90 days to get verification from Dr., SS or VR?

A: Statements about the ES-3900 are in the manual pages, section 2521(2). The ES-3900 reference is for those clients whose disability is being evaluated through the PMDT process. If the client is going through the PMDT process, they will be considered exempt from the ABAWD provisions. If found to not be disabled, then follow the provisions in the manual and the person becomes an ABAWD the month following the month the agency is notified they are not disabled.

If the person is not going through the PMDT process and the disability is not evident, then see the answer to Question 4.

Q: Regarding ABAWDS and the exemption that we may allow if they self-declare they are unfit for employment, should interviewing staff automatically provide them an ES-4309 and pend it to purple? Or, do interviewing staff still have the option of exercising prudent person judgment and interviewing skills when they suspect the self-declaration might be suspicious to get to the heart of the situation with the client. I'm not talking interrogation or dragging out an interview, but the use of some reasonable follow-up questions and dialogue about fitness for employment perhaps? Thanks for any clarification that can be provided.

A: Persons can only self-declare disability if their disability is being evaluated through the PMDT process. Also refer Q and A 4 and 5.

Q: We have a volume of individuals that are receiving VA benefits for a percentage of a disability. This may only be a 10% disability. They are not getting any Social Security disability, and what seems apparent is that they are able to work. Will they meet the criteria to be a non ABAWD based upon the VA? Or since the disability is not apparent and they are not getting SSI/SSDI, they would have to obtain verification from a medical/mental health provider to validate their non ABAWD status?

A: We have discussed this and determined that any veteran getting VA benefits for any percentage of a disability will be exempt from the ABAWD provisions.

Dependents Under the Age of 18 in the Home

8. Q: There seems to be some confusion regarding the following statement that was included with the KEESM Revision 61 announcement:

"The ABAWD must be a member of a food assistance household containing children under the age of 18 – Under the old ABAWD policy, an ABAWD was exempted from the provisions if they resided in a household with a child under the age of 18. With this new implementation, the child under the age of 18 must be a member of the food assistance case containing the ABAWD. Members include children who are coded DI or DF - for failure to provide an SSN or not meeting non-citizen criteria (DI), or unwilling or unable to provide non-citizen verification (DF). (See 4212.2 and 4212.3)".

A: I can see the confusion in the header. The following paragraph explains the intent. The header should state, "*To be exempt from* the ABAWD provisions, the ABAWD must be a member of a food assistance household containing children under the age of 18.

9. Q: Pregnant 20 year old applied for FA 10-15-13. She currently lives with her mother. Neither of them are working 20 hours a week. The FA case is opened for two persons. Is the mother an ABAWD?

A: Yes. There is no dependent under the age of 18 in the home until the baby is born. If the mother doesn't meet any of the exemption criteria, she is an ABAWD. The daughter is not, since she is pregnant. Once the baby is born, the grandmother becomes exempt from the ABAWD criteria.

10. Q: PI applies for himself only, he lives with 2 other adults. 1 of the other adults has joint custody of his 12 year old son who is in the home less than 51% of the time. Is the PI exempt from the ABAWD criteria?

A: The PI is not exempt from the ABAWD criteria because he does not have a dependent under 18 on his food assistance case. IF all three adults were on the same food assistance case, and one had joint custody as noted above, the three would only become non-ABAWDs if the child was a member of the food assistance household (parent provided the majority of the child's meals).

11. Q: If the ABAWD is living in a homeless shelter where there are children of other families, will that meet the criteria of living in a home with a person under the age of 18?

A: Policy has changed since the teleconference. The dependent under the age of 18 must be a member of the food assistance household containing the potential ABAWD. The child may be coded DI or DF, but the child is still considered a member of the household.

12. Q: Mom applies for FA for herself and 18 year old son who is still in high school. Mom works 18 hours a week at minimum wage. Is the mother considered an ABAWD or not until the child turns 19?

A: If she is not getting TANF for the child, then she is an ABAWD not meeting the work requirement.

Expedited Benefits After Receiving 3 of 36 Months as an ABAWD

13. Q: Can we get some clarification of expedited and ABAWDs that have received their 3 months out of 36? For example, case closed 12-31 due to receipt of three months of benefits as an ABWAD. Client reapplies in May and is eligible for expedited benefits, claims they worked the required 80 hours in February but worker is unable to verify the information within the 7 day expedited time period. Is the applicant eligible for expedited benefits?

A: To get expedited benefits, you first have to be eligible for food assistance. If an ABAWD has received their 3 months out of 36, they are no longer eligible for food assistance. We cannot waive verification of the 80 hours because it is an eligibility requirement for ABAWDs that have already used their 3 of 36 months. If they provide the verification, and they are otherwise eligible, the three month extension can be approved. If we did not follow this policy, ABAWDs that had had their 3 months of eligibility could repeatedly reapply and get expedited benefits when they would otherwise not qualify.

14. Q: In another expedited question, can we waive verification of an exemption from the ABAWD provisions if the person has already had their 3 months out of 36? For example, a person reapplies after receiving their 3 months and claims they are in an alcohol and drug treatment program. Can we take their statement of this, or do we have to verify it?

A: The household/person must be eligible for food assistance before we can determine if they are entitled to expedited benefits and if the ABAWD has received their 3 months out of 36 they are no longer eligible. So, if the exemption from the ABAWD criteria is questionable, then verification of the reason for the exemption is mandatory and it cannot be waived. See the answer to Question 9 above. It's the same situation. Some exemptions may not need verification and some might. For example, if a dependent child is under the age of 18 on the food assistance case that would not need to be verified unless prudent person questions that there really is a child under 18 in the home. A person being in a alcohol and drug treatment program would require verification.

3116 - Simplified Reporting Handout

15. Q: Will wording be added to the ES-3116 regarding the ABAWD reporting requirements?

A: Yes, additional wording has been added to the ES-3116 in both English and Spanish regarding the ABAWD reporting requirement.

Potential Overpayments for not Reporting ABAWD Hours Under 20 a Week

16. Q: Also, on the t/c referenced potential overpayments for ABAWDs who fail to report when they stop meeting the work requirement. Would we go ahead and consider the 3 month extension period first? For example, client receives FS Oct-Dec 2013, using their ABAWD months. They find a job in Jan 2014 and reapply for FS in March. They are determined eligible working 20 hr/wk but later lose their job in May. They don't report their job loss until their IR in Aug. It sounds like they could be eligible for 3 additional months of extension FS, but the teleconference material sounds like the 3 month extension starts after they notify the state of the lost job. So, would we process OP for the months they didn't report, then turn around and process 3 additional months of extension?

A: Reporting the job loss (going under 20 hours a week for an ABAWD) is a simplified reporting requirement. If they lose the job in May, they are required to report that by June 10th. July would be an overpayment since they did not meet the ABAWD eligibility requirements. The IR is received in August and they report the job loss. The one-time 3 month extension begins in August and would go consecutively until October 31st.

Other Eligibility Criteria Overrides ABAWD Criteria

17. Q: PI applies for FA on 10-15-13. Job quit without good cause on 10-2-13. Does the potential employment violation override ABAWD criteria?

A: Yes. A potential employment violation would be evaluated and applied before we would consider the ABAWD criteria IF the person has not already received their 3 month in 36 as an ABAWD. IF they've already received the 3 months, there is no eligibility for FA unless exempt or meeting the work requirement.

If we are initially determining ABAWD status, then other eligibility criteria must be met first. For example if the person is a student and an ABAWD, you must determine student eligibility criteria first. If they meet student eligibility criteria, then they are exempt from the ABAWD provisions. If ineligible as a fleeing felon, then there is no need to evaluate ABAWD criteria.

JOPR Coding

18. Q: If the ABAWD is exempt due to living with a dependent under age 18, what is the correct JOPR coding?

A: The appropriate JOPR coding according to the client's circumstances should be used, however, DO NOT use AB MD. See the ABAWD desk aid. JOPR codes are included.

Processing Ongoing Cases

19. Q: I'm concerned with the roll forward and close process because we might have some ABAWD cases where we also have open MS—for example, a disabled spouse open for MS and an ABAWD spouse on a FA case together. I wouldn't want staff rolling those cases to January to close effective December 31 because I'm afraid it might mess with KEES transition or mass change.

A: The roll forward and close process is an option. If it is not appropriate for the case in question – such as noted above – do not use that process. Instead set an alert to follow up in time to close the ABAWD by adverse action deadline in December.

20.Q: If we have a September review closure 9/30, and customer comes in to the lobby and applies for FS Oct. 8th, and we prorate to 10/8, is that handled like an application or a review, as far as ABAWD policies go? In other words, do we go ahead and treat this like a review and give the customer 3 ABAWDS months of Nov, Dec, and Jan, and close now for 1/31. Or do we treat like an application, and set alerts to close 1/31, but leave the case open.

A: It's a late review and benefits are prorated. Since this wasn't an ongoing case as of 10/1/13, we would ask that at an alert be set to remove the person or close the case at the end of January. Don't use the roll forward option for ongoing cases. The memo notifying staff of the roll forward and close process specifically stated: "Note that this plan does NOT apply to new ABAWD applications after 10/1/13. An alert must be set to close these cases or remove the ABAWD at the end of the three full months of benefits. This is also especially true as we just cannot predict what mass changes may be upcoming."