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Assistant Commissioner

The following Decision is distributed for your information. This Decision has been made in consideration of the specific facts of this case. This Decision is not to be interpreted as establishing any new mandatory policy or procedure otherwise officially promulgated.

STATE OF NEW JERSEY
DEPARTMENT OF HUMAN SERVICES

FINAL DECISION

OAL DKT. NO. HPW 09760-25 T.W.

AGENCY DKT. NO. C090729018 (SOMERSET COUNTY BOARD OF SOC. SVCS.)

Petitioner appeals from the Respondent Agency's termination of Work First New Jersey/Temporary Assistance for Needy Families ("WFNJ/TANF"), Emergency Assistance ("EA"), and Supplemental Nutrition Assistance Program ("SNAP") benefits. The Agency terminated WFNJ/TANF benefits to Petitioner for a period of two months, contending that Petitioner had voluntarily ceased employment and failed to provide information. The Agency terminated Petitioner's EA benefits because she was no longer a WFNJ benefits recipient, nor was she a Supplemental Security Income ("SSI") benefits recipient, as well as that her rent exceed the Fair Market Rent ("FMR") for the county. The Agency terminated Petitioner's SNAP benefits contending that she failed to provide information necessary to determine eligibility for continued receipt of such benefits. Because Petitioner appealed, the matter was transmitted to the Office of Administrative Law for a hearing. On August 5, 2025 the Honorable Sarah G. Crowley, Administrative Law Judge ("ALJ"), held a telephonic plenary hearing, took testimony, and admitted documents. The record was held upon to allow for additional submissions by the Agency following a request from the ALJ, and closed on August 13, 2025. On August 21, 2025 the ALJ issued an Initial Decision, affirming the Agency's determinations.

No Exceptions to the Initial Decision were received.

As Assistant Commissioner, Division of Family Development, Department of Human Services, I have considered the ALJ's Initial Decision, and following an independent review of the record, I hereby MODIFY the Initial Decision, and AFFIRM the Agency's determinations, based on the discussion below.

"An adult recipient [of Work First New Jersey ("WFNJ") cash benefits] who voluntarily quits a job, without good cause, shall render the entire assistance unit ineligible for WFNJ cash assistance benefits for a period of two months from the date [the Agency] makes the determination that the recipient quit the job." See N.J.A.C. 10:90-4.14(a).

Only WFNJ cash assistance recipients and SSI benefits recipients are eligible for EA benefits. See N.J.A.C. 10:90-6.2(a).

N.J.A.C. 10:87-10.5(a) provides, in pertinent part that, any individual subject to the NJ SNAP work requirements who voluntarily quits his or her job without good cause shall not be eligible to participate in the NJ SNAP program in accordance with the provisions at (c) below." In relevant part, N.J.A.C. 10:87-10.5(c) provides that, if it is the first instance of a violation, then the household member shall be disqualified from receiving NJ SNAP benefits for a period of one month. See N.J.A.C. 10:90-87-10.5(c)(1)(i), (2)(vi)(1). Additionally, the disqualification period is effective upon the issuance of the notice of denial. See N.J.A.C. 10:87-10.5(c)(1).



Here, the record reveals that, as part of the redetermination/recertification process, on March 24, 2025, the Agency requested that Petitioner submit her offer of employment letter and paystubs in relation to her WFNJ/TANF and SNAP cases. See Exhibit R-1. Petitioner submitted one paystub for the period of March 11, 2025 to March 30, 2025, but failed to submit all of the requested information. Ibid. In addition, on April 8, 2025, the Agency notified Petitioner that her last EA benefits would issue on June 1, 2025, citing that the rent for her apartment, upon the renewal of her lease on June 16, 2025, would exceed the FMR for a two-bedroom unit in the county. See Exhibit R-1; see also N.J.A.C. 10:90-6.3(7)(i)(1).

On May 7, 2025, the Agency notified Petitioner that both her WFNJ/TANF and SNAP benefits cases would close on June 1, 2025, due to her failure to provide paystubs for the past 30 days, as the one paystub provided was insufficient to calculate her income for continued program eligibility. See Exhibit R-1; see also N.J.A.C. 10:90-2.2(a)(5), N.J.A.C. 10:87-2.15. On May 8, 2025, the Agency notified Petitioner that her EA benefits would be terminated, with the last EA benefits being issued on June 1, 2025, due to her no longer being a WFNJ benefits recipient. See Exhibit R-1; see also N.J.A.C. 10:90-6.2(a).

On May 15, 2025, the Agency received an employment separation notice and determined that Petitioner had voluntarily ceased her employment without good cause, which required the imposition of a 60-day penalty from receipt of WFNJ/TANF benefits, as well as a 30-day penalty from receipt of SNAP benefits (as to the Petitioner only). See Exhibit R-1; see also N.J.A.C. 10:90-1.15, -4.14 and N.J.A.C. 10:87-2.3, -10.5. On May 21, 2025, the Agency sent Petitioner notification that her WFNJ/TANF case would remain closed due to her voluntary cessation of employment and result in a 60-day penalty from receipt of such benefits, as well as indicating that the SNAP case would be reopened, as a household of one (Petitioner's son) on June 1, 2025, but that Petitioner would be removed from the case for 30-days due to her voluntary cessation of employment, with her being added back to the case beginning July 1, 2025. Ibid. The following day, May 22, 2025, a fair hearing was requested and Petitioner was granted continued WFNJ/TANF and EA benefits pending the outcome of such hearing. See Exhibit R-1.

The ALJ found, and the record substantiates, that Petitioner voluntarily quit her employment, without good cause, when she indicated her separation was voluntary. See Initial Decision at 2-3; see also Exhibit R-1, and N.J.A.C. 10:90-4.14(b). Based on the foregoing, the ALJ concluded that the Agency's termination of Petitioner's WFNJ/TANF benefits, and the imposition of a two-month voluntary quit penalty, were proper and must stand. See Initial Decision at 3-4; see also Exhibit R-1 and N.J.A.C. 10:90-4.14(a). I agree.

Additionally, as I agree with the ALJ, that the termination of Petitioner's WFNJ/TANF benefits was proper, I also find that the Agency's termination of Petitioner's EA benefits, due to the fact that Petitioner was no longer a WFNJ benefits recipient, was also proper and must stand. See 10:90-6.2(a) and Exhibit R-1. The Initial Decision is modified to reflect the above findings.

By way of comment, the Initial Decision in this matter indicates that the termination of Petitioner's Supplemental Nutrition Assistance Program ("SNAP") benefits was rescinded. See Initial Decision at 2. As such, it is not addressed in this Final Agency Decision.

Accordingly, the Initial Decision is hereby MODIFIED, and the Agency's determinations are AFFIRMED, as outlined above.

Officially approved final version. December 11, 2025

Natasha Johnson
Assistant Commissioner

