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# Expanded SNAP Work Requirements and Time Limits: Guidance for Employment Social Enterprise Leaders

Recent federal policy changes<sup>1</sup> expand work requirements in both SNAP (Supplemental Nutrition Assistance Program) and Medicaid. These changes are likely to affect some workers employed by Employment Social Enterprises (ESEs), in California and nationwide. While Medicaid work requirements are expected to roll out in most states beginning in 2027, SNAP changes are already being implemented in many states and will apply nationwide this year.

Many low-income households rely on both programs, and some individuals may eventually be subject to work requirements in both. However, SNAP and Medicaid operate under separate eligibility rules, reporting systems, and timelines. SNAP applies a strict time limit to certain people who are not meeting work requirements, whereas new Medicaid work rules will function as a continuous eligibility test at the outset.

In this brief, the phrase “*work requirements*” refers broadly to employment or other qualifying activities that allow individuals to maintain eligibility. These activities may include paid work, approved training programs, volunteer activities, or participation in certain employment programs.

This brief focuses on the expansion of SNAP work requirements and associated time-limit provisions. It explains what has changed, who is affected, and what Employment Social Enterprise leaders may wish to consider in response. Addressing these considerations may also help position ESEs for the later implementation of Medicaid work requirements.

## KEY TAKEAWAYS

- More SNAP recipients now face strict work requirements and time limits, increasing pressure on workers to document employment or qualifying activities to maintain benefits.
- Workers may experience increased stress, confusion, and fear of losing food assistance.
- Employment Social Enterprises are uniquely positioned to help workers meet these requirements.
- Organizational culture and communication matter. Sensitivity, clear information, and connections to expert resources can help workers navigate the rules.
- Operational adjustments can help protect workers’ benefits, including:
  - Accelerating start date to work
  - Structuring jobs and programming to meet participation requirements
  - Supporting documentation and reporting
  - Planning carefully for employment transitions

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<sup>1</sup> [Budget Reconciliation Bill](#)

## MORE SNAP RECIPIENTS NOW FACE STRICTER WORK REQUIREMENTS AND TIME LIMITS

To understand how these policy changes may affect your organization and the workers you employ, it is helpful to first review the basics of SNAP work requirements and time limits. The following questions and answers summarize what has changed, who is affected, and what activities count toward meeting these requirements.

### What Are SNAP Work Requirements and Time Limits?

SNAP has two sets of work requirements:<sup>2</sup>

- **General Work Requirements** apply to most working-age SNAP recipients (ages 16-59). These require individuals to: register for work, accept suitable job offers, not voluntarily quit jobs or reduce work hours, and participate in SNAP Employment & Training (E&T) programs or workfare if assigned. Failure to meet the general work requirements disqualifies participants from SNAP for at least a month until requirements are met.
- **ABAWD Work Requirements** are more stringent and apply to "Able-Bodied Adults Without Dependents." ABAWDs are required to work or participate in qualifying activities for at least **80 hours per month**.

If ABAWDs fail to satisfy work requirements, they are limited to **only 3 months of SNAP benefits every 36 months**. ABAWDs may receive SNAP benefits for longer than 3 months if they meet the work requirement, are excused from the work requirement, or are living in an area that is waived from the work requirement.

### What Has Changed?

The 2025 Budget Reconciliation Bill **expanded who is subject to ABAWD work requirements and time limits**. The law increased the age range of individuals who may be subject to the rule, narrowed the exemption for adults living with children, and eliminated automatic exemptions for several populations. The table below summarizes these changes.

	Previous Rules	Current Rules
<b>Age Range</b>	18 – 54	18 – 65
<b>Caregiver Status</b>	Responsible for the care of a child under age 18	Responsible for the care of a child under age 14
<b>Exemptions</b>	<ul style="list-style-type: none"><li>• Medically certified as physically or mentally unfit for employment</li><li>• Pregnant</li><li>• Caring for an incapacitated person</li><li>• Work requirements waiver is in place</li><li>• Veterans</li><li>• Individuals experiencing homelessness</li><li>• Adults under 25 who had been in foster care on their 18th birthday</li></ul>	<ul style="list-style-type: none"><li>• Medically certified as physically or mentally unfit for employment</li><li>• Pregnant</li><li>• Caring for an incapacitated person</li><li>• Work requirements waiver is in place (stricter requirements for states to receive)</li></ul>

<sup>2</sup> <https://www.fns.usda.gov/snap/work-requirements>

Even SNAP recipients who were already subject to work requirements are anticipated to face new challenges moving forward, including:

- Stricter enforcement and verification
- More frequent paperwork requirements
- Less state flexibility to provide waivers during economic downturns

### **What activities count toward meeting the ABAWD work requirements and will pause the 3-month clock?**

Documented participation in any combination of the following activities for 80 hours a month pauses the 3-month clock for SNAP recipients subject to ABAWD work requirements.

- Paid employment or work in exchange for goods or services.
- Unpaid, volunteer work.
- Approved work program activities, including SNAP Employment and Training (SNAP E&T) and Workforce Investment and Opportunities Act (WIOA) funded programs.
- Participation in volunteer work through a workfare program for an assigned number of hours per month. Required hours may be less than 80 hours per month.<sup>3</sup>

### **Is the programming a SNAP recipient participates in at our ESE or affiliated nonprofit countable toward ABAWD work requirements?**

SNAP recipients can count all hours of paid employment from your ESE or any other employer toward meeting ABAWD work requirements. However, time spent in programming at your ESE or another employment and training service provider does not automatically count toward work

### **Spotlight California: Work Requirements and Support Infrastructure**

In California, SNAP is administered as *CalFresh*, and work requirements—including ABAWD time limits—are implemented by county human services agencies under guidance from the California Department of Social Services (CDSS). While federal rules set the baseline, California has historically taken a more supportive, participant-centered approach, including broad use of exemptions and a voluntary CalFresh Employment & Training (CFET) program. As federal changes expand work requirements, ESEs should be aware that implementation details—such as how hours are verified, which activities count, and how exemptions are applied—may vary by county. Building relationships with [local county CalFresh offices](#) is critical to ensuring participant workers receive accurate guidance. Key statewide resources include CDSS [CalFresh policy guidance](#), [BenefitsCal](#) for applications and case management, and CalFresh Outreach providers.<sup>4</sup> Additional outreach and navigation support is available through community-based organizations, including community action agencies, legal aid groups, and workforce partners such as community colleges. Given California’s county-administered structure, strong local partnerships can help ESEs align programming with requirements and connect participants to trusted, culturally competent support.

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<sup>3</sup> Workfare is unpaid work arranged by a public agency in which a person works a set number of hours in exchange for a public benefit. The number of hours assigned is calculated by dividing their benefit (e.g., SNAP) level by the minimum wage.

<sup>4</sup> Outreach providers through 2027 include: 2-1-1 San Diego, The California Association of Food Banks, Catholic Charities of California, Chico State Enterprises - Center for Healthy Communities, Code for America, Aliados Health, The California Department of Aging. Specific providers by county can be [found here](#).

requirements, regardless of whether an individual is receiving a stipend to support their participation.

Programming offered through an ESE or affiliate nonprofit may count toward ABAWD work requirements. The most common categories include:

- **WIOA and Trade Adjustment Act (TAA) programs** – These programs are recognized in federal law as qualifying work programs and automatically count toward ABAWD work requirements.
- **SNAP Employment and Training (E&T) programs** – If your ESE is a SNAP E&T provider, your program components are already part of a state-approved structure. However, ESEs should confirm with their state or county SNAP agency:
  - Which program activities count toward work-requirement hours and whether sufficient countable hours are offered<sup>5</sup>
  - Limits on counting job-search activities - Job search must be less than half of required hours to qualify towards ABAWD work requirements.
  - How hours must be tracked and reported
- **Other employment and training programs approved by SNAP agencies** – SNAP administering agencies<sup>6</sup> may also approve other employment and training programs to count toward ABAWD work requirements. Program components most likely to qualify include:
  - Work experience
  - Education and training activities, including basic skills, vocational training, and some post-secondary programs.

If you believe programming at your ESE could count towards work requirements, reach out to your [state or local human services agency](#) administering SNAP to confirm qualifying activities and how participants should document participation. If you are not already, you may consider becoming a SNAP E&T provider to take advantage of program reimbursements.

## JOB SEEKER CIRCUMSTANCES ARE CHANGING; ESES WILL NEED TO ADAPT

The extension of ABAWD work requirements to additional SNAP recipients may increase the number of people seeking work through ESEs. It may also change who those applicants are and the pressures they face. ESEs may see shifts in applicant demographics, workers whose motivation is shaped by the need to comply with benefit rules and increased financial stress among participants concerned about losing access to food assistance.

### Shifts in the Applicant Pool and Workforce Demographics

Given the expansion of ABAWD work requirements and the elimination of several prior exemptions, your ESE may observe changes in who applies for and participates in employment and programming, including:

- More parents with dependent children ages 14–17. Because women are more likely to have primary custody of children, this may result in more female applicants.

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<sup>5</sup> <https://fns-prod.azureedge.us/sites/default/files/resource-files/SNAP-ABAWD-Policy-Guide-September-2023.pdf>

<sup>6</sup> States with county administered programs are listed [here](#).

- More older adults (ages 55–64), individuals experiencing homelessness, recent foster youth, or veterans.

**Consider:** Do your business lines, job roles, and workplace accommodations align with this shifting demographic? Do you need to adjust physical job demands, scheduling flexibility, or support services?

### Shifts in Job Seeker Motivation

ESEs may increasingly receive inquiries and applications from individuals whose immediate focus is maintaining SNAP benefits, rather than pursuing long-term career advancement. This shift may:

- Affect morale and workplace culture
- Change patterns of engagement and retention
  - Understand that ESE enrollment periods may not align with participant timelines to retain benefits.
- Suggest adjustments to curriculum and coaching approaches that best serve your participant workers.

**Consider:** How will you maintain a focus on long-term economic power when some participants are focused on meeting their basic needs? What changes to curriculum or coaching approaches (e.g., motivational interviewing) might help participant workers commit to longer-term career goals?

### Increased Financial Stress Among Applicants and Workers

Applicants, current employees, and alumni may experience increased financial stress as they navigate new requirements, including:

- Confusion about rules and timelines
- Anxiety about documentation and verification
- Fear of losing food benefits
- Food insecurity if their three-month time limit has already been exhausted

**Consider:** How will your staff and programs recognize and respond to stress-related behavioral changes, absenteeism, or workplace conflicts? How can workplace discipline be handled without exacerbating food insecurity? How will you support staff members who may experience vicarious trauma?

Before turning to specific operational adjustments, ESEs should ensure that staff and organizational culture are prepared to respond thoughtfully to the new circumstances many workers may face. The following practices can help organizations communicate clearly, respond sensitively to food insecurity, and connect workers to reliable sources of information. ESEs should:

### Ensure a Trauma-Informed Response to Food Insecurity

The threat of losing food assistance can be deeply traumatic, particularly for parents worried about feeding their children,<sup>7</sup> individuals with histories of food insecurity, and those without family or community safety nets. Within ESE workplaces and programs, this stress may manifest as irritability or

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<sup>7</sup> Minor children of adults who lose SNAP benefits will still qualify for benefits. However, sanctioning of the parent from SNAP will still reduce the total amount of resources the family has available to expend on food.

conflict, difficulty concentrating or decreased productivity, and increased absenteeism related to physical symptoms of stress, inadequate nutrition, benefits appointments, or visits to food banks. ESEs are encouraged to:

- Train all staff in trauma-informed approaches and recognizing food insecurity
- Provide on-site snacks and meals whenever financially feasible
- Keep emergency food supplies available for crisis situations
- Connect participants to food banks and meal programs as needed
- Ensure staff approach the topic with sensitivity
- Assist people with calling their local SNAP offices, locating the nearest one to them, and providing transportation assistance to the office if/when possible.

### **Communicate Early and Often to Reduce Confusion and Chilling Effects**

Confusion about policy changes may cause eligible participants to avoid applying for benefits, disenroll unnecessarily, or worry about losing benefits even when they are in compliance. Clear, proactive communication can reduce these “chilling effects” and help participants navigate changes with greater confidence. ESEs should:

- Share accurate, timely information about what is changing and when. Direct individuals to their state or local human services agency regarding questions about their individual benefits.
- Communicate early and incorporate updates into regular check-ins and one-on-one conversations.
- Use group settings (team meetings, all-staff lunches) to normalize conversations about benefits, while offering private follow-up for individuals who want to discuss their situation
- Emphasize that working at your ESE may already satisfy work requirements (for workers engaged at least 20 hours per week).
- Clarify with the state or local human services agency whether programming at your ESE counts toward work requirements.
- Use empathetic, non-stigmatizing language that avoids creating unnecessary alarm
- Connect participants to knowledgeable resources when questions arise

### **Connect to Expert Resources**

To support a trauma-informed response and avoid misinformation, ESEs should ensure that program staff understand the basics of SNAP, including work requirements, time limits, and recent policy changes. Most ESEs do not have the capacity to serve as benefits experts, but they can build relationships with organizations that specialize in this area and can answer questions or provide referrals, such as:

- Your state or local human services agency
- Legal aid organizations
- Community-based organizations specializing in public benefits, such as benefits navigators
- Food banks and public health clinics
- State or county agencies that administer benefits

Benefits-administering agencies can be valuable sources of clarification about policies and documentation requirements. In some communities, establishing a point of contact within the agency can make it easier to resolve participant questions as they arise. Even if day-to-day communication typically occurs through case management or direct service staff, leadership involvement in initial relationship-building can help establish and sustain these connections.

## OPERATIONAL CHANGES CAN HELP WORKERS MAINTAIN BENEFITS

Employment Social Enterprises can play an important role in helping workers navigate SNAP work requirements and avoid unnecessary loss of benefits. The strategies below highlight practical program and operational adjustments that may help participants meet requirements, document their eligibility, and reduce the risk of exhausting their three-month time limit. They progress roughly in the order that workers experience them—from intake and early employment through program participation and post-graduation transitions.

### Gather Information about Work Requirement Status

With more people subject to time limits, it is more important than ever for ESEs to be aware of the benefit status of applicants and workers. During intake, ESEs should gather key information such as:

- Whether the individual is currently receiving food assistance, including SNAP.
- Whether they are subject to ABAWD work requirements (if individuals are unsure, staff may be able to approximate based on their age, whether they have dependent children and the age of those children, and potential exemptions)
- If known, how much of their three months of benefits they may have already used, if subject to ABAWD requirements
- What is their recertification period?

In addition to incorporating these inquiries into intake, you may also want to ask similar questions to existing workers during one-on-one coaching sessions to better understand their status as well. The ESE can offer more support to workers if you are aware of their individual circumstances. However, if your ESE is unable or uncomfortable keeping records on this information about individuals, you can conduct anonymous surveys to inform your response to expanded application of SNAP work requirements.

### Accelerate Time to Employment

For individuals subject to ABAWD work requirements, each day without participating in work or another approved activity counts against their 3-month clock. ESEs can help preserve time on that clock by:

- Streamlining ESE application and enrollment processes.
- Reducing the time between application and the first day of work.
- Ensuring at least 80 hours per month of countable activity during pre-employment periods.
- During employment, combine paid work and other countable activities to reach at least 80 hours a month.

If your ESE cannot consistently provide rapid access to work or countable programming, consider creating differentiated pathways for SNAP recipients to protect workers facing time limits. After confirming with legal counsel that such policies do not inadvertently discriminate on the basis of race, gender, disability, or other protected characteristics, ESEs may be able to tailor internal processes based on programmatic need.

To minimize the risk that job seekers lose food benefits, ESEs may wish to create an “expedited to work” pathway for individuals subject to ABAWD work requirements. Earlier access to at least 20 hours per week of work or qualifying programming or expedited enrollment for those approaching their three

month mark may help prevent these job seekers from depleting their “3-in-36 month” limit while waiting to begin work.

Any such prioritization should be offered to all workers facing similar risks and should complement, rather than replace, the supports available to other job seekers.

### **Re-structure Jobs and Programs to Protect Participant Workers from Time-Limit Risks**

Once participants begin working, ESEs should ensure that job and program structures enable workers to consistently meet ABAWD participation requirements. ESEs can take steps such as:

- Ensuring that ESE jobs provide at least 80 hours per month of work.
- Combining work with other countable activities when work hours alone are insufficient.
- Structuring work and programming schedules so hours are spread across the month—or front-loaded when possible—to reduce the risk that workers fall short of monthly participation requirements.
- Confirming in writing with your SNAP administering agency that your programming counts toward ABAWD work requirements.
- Tracking and documenting workers’ employment and program hours reliably.

### **Integrate Proactive Support Around SNAP Recertification and Reviews**

SNAP participants must periodically confirm their eligibility to continue receiving benefits. This typically includes a full recertification every 6–12 months and a shorter interim report midway through the certification period to update key information such as income or household changes. For many current SNAP recipients, the updated work-requirement and exemption rules will take effect at their next recertification or interim review, when state or county agencies re-screen them under the new ABAWD criteria and verify whether they are meeting work requirements.

For participant workers, these reviews can trigger several risks, including changes in exemption status, the start or restart of the “3 months in 36” time-limit clock, and loss of benefits due to missed deadlines, paperwork or difficulty documenting work or program hours.

Because of these risks, ESEs can treat recertifications and interim reviews as predictable stress points for participant workers. To the extent that ESEs are able to accurately identify key deadlines, providing practical support at these junctures can prevent avoidable benefit losses and reduce anxiety and distraction that might otherwise spill over into job performance and participation in programming. ESEs can support workers during these periods by:

- Tracking participant workers’ upcoming recertification dates where feasible and issuing reminders in advance
- Helping workers interpret notices from SNAP agencies and understand what actions are required
- Supporting workers in documenting work or program hours or verifying exemption status
- Adding a field in intake or case management systems for “SNAP recertification month” so staff can anticipate the need for support
- Offering periodic one-on-one or small group sessions on reading notices, understanding work rules, and organizing documentation, with workers approaching recertification referred to the next available session.

## Support Documentation and Reporting

Participant workers subject to ABAWD work requirements must demonstrate to the SNAP agency that they are meeting those requirements. ESEs can support this by:

- Confirming what documentation your state or county SNAP agency requires from employers and training providers, and at what intervals
- Providing clear, timely job offers and employment or program verification letters that meet SNAP agency requirements, and considering template letters or online portals to simplify verification
- Helping participant workers understand SNAP notices and reporting requirements

## Manage Post-Graduation Gaps

Participant workers who complete your program without a next job lined up may face the restart of their 3-month clock or the loss of SNAP benefits during their job search, depending on where they are in their 3-in-36 cycle. Because work requirements are assessed monthly, the timing of program exit matters. Leaving before monthly participation hours are reached may cause that month to count toward the 3-month limit. With time limits hanging over them, participants may also feel pressure to accept any available job quickly rather than pursue a quality next-step opportunity. ESEs should consider steps such as:

- Delaying exits for participants who are not moving immediately into next-step employment until they have reached their monthly 80-hour participation threshold. Graduates will then have the full following month to secure their next job and accumulate required work hours
- Pairing time-limited extensions with clear job-search expectations and intensified support to help transitioning participant workers maintain benefits and income while continuing to pursue next-step employment
- Reducing transitioning participants' work hours to the minimum required to maintain benefits in order to maintain their motivation to search for jobs offering greater hours and higher earnings. Prepare workers for the potential that such a transition may disqualify them from SNAP.
- Connecting graduates to programs—within or outside your organization—that count toward qualifying activities, and helping those under 20 hours per week combine those activities with additional programs, employment, or volunteer work
- Partnering with employers who hire quickly and minimize the time between hire and the first day of work.

## Add New Criteria for Employer Partnerships

In addition to adjusting internal program design, ESEs may also wish to revisit the criteria they use when identifying next-step job opportunities and building partnerships with employers. Recent and anticipated policy changes suggest ESEs should also prioritize:

- Demonstrated willingness to hire older workers (ages 55–64)
- Predictable schedules and flexibility that enable workers with caregiving responsibilities to sustain employment
- Compensation sufficient to allow workers to transition off SNAP, or at minimum enough hours to maintain eligibility (20+ hours per week)
- Pathways to jobs offering health insurance, given expected Medicaid policy changes
- Fast hiring processes and quick start dates that minimize employment gaps

- Willingness to promptly provide verification of employment and hours worked to comply with SNAP reporting requirements.

Taken together, these strategies can help ESEs reduce the risk that participant workers lose SNAP benefits while continuing to support their career development.

## SUMMARY: SNAP CHANGES INCREASE RISK FOR WORKERS; ESES CAN HELP

Recent policy changes mean that more adults now face SNAP work requirements and time limits. For participant workers subject to these rules, the implications are significant. Those who do not meet the requirement—80 hours per month of employment or other qualifying activity—risk losing access to critical food assistance.

Employment Social Enterprises are well positioned to help workers navigate these changes and meet work requirements, but doing so may require adjustments to operations and program design. By preparing staff to communicate sensitively about food insecurity, accelerating time to employment, structuring roles to meet participation thresholds, and helping participants document their eligibility, ESEs can reduce the likelihood that workers unintentionally lose benefits.

In the near term, ESEs should learn more about how ABAWD work requirements are being implemented in their state and what documentation is required. If participants are not consistently working at least 20 hours per week from intake through exit, ESEs may wish to couple work with programming. ESE taking this approach should seek confirmation that their programming counts toward work requirements. Some organizations may find it helpful to convene a small internal team to review the considerations outlined in this brief and identify operational adjustments that could better support participant workers.

Taking these steps can help maintain stability for participant workers while supporting pathways to long-term employment. They will also strengthen organizations' readiness for the implementation of Medicaid work requirements beginning in 2027.

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For questions about SNAP Employment and Training (SNAP E&T) and SNAP work requirements, please reach out to [sposter@redf.org](mailto:sposter@redf.org) or [mnelson@redf.org](mailto:mnelson@redf.org), for questions related to economic power, please reach out to Galiana Fajardo [galiana@redf.org](mailto:galiana@redf.org).

To view an infographic summary check out: [Expanded SNAP Work Requirements and Time Limits: What ESE Leaders Need to Know.](#)