

MARCH 2026

Expanded SNAP Work Requirements

What ESE Leaders Need to Know

The 2025 Budget Reconciliation Bill expands who faces SNAP work requirements and time limits — affecting workers nationwide.

WHAT CHANGED UNDER THE 2025 BUDGET RECONCILIATION BILL

These changes redefine ABAWDs and their work requirements.

AGE RANGE

~~Ages 18–54~~

Ages 18–65

Increasing the age range by 11 years

CAREGIVER EXEMPTION

~~Child under 18~~

Child under 14 only

Parents of teens 14–17 no longer automatically exempt

ELIMINATED EXEMPTIONS

~~6 protected groups~~

3 protected groups

Veterans, adults experiencing homelessness, and former foster youth no longer exempt

THE CORE RULE

ABAWD Work Requirements

80 hrs

per month required

Able Bodied Adults Without Dependents (ABAWDs) who do not meet the 80-hour monthly work requirement are limited to only 3 months of SNAP every 36 months.

New enforcement: stricter verification, more paperwork, less state flexibility for waivers.

KEY TAKEAWAYS

Impact on ESEs

- **More workers now at risk** of losing food assistance, increasing stress and documentation burdens.
- **ESEs are uniquely positioned** — employment and qualifying programs can help workers meet the 80-hour threshold.
- **Culture matters.** Sensitive communication and trauma-informed responses are essential.
- **Operational changes** — from faster enrollment to smarter program exits — can prevent avoidable benefit loss.
- **Medicaid work requirements** roll out in 2027; preparing now builds readiness for both.

WHAT COUNTS TOWARDS THE 80 HOURS?

Qualifying Activities



Paid Employment

Any paid work at ESE or other employer. All hours count.



Volunteer Work

Unpaid volunteer activities in qualifying settings.



Approved Work Programs

Such as WIOA, TAA, or other locally approved programs.



SNAP E&T

If an ESE is an approved provider, participation in most components count.



Workfare

A government-sponsored volunteer program. Hours may be less than 80/month.

How ESEs Can Respond: Workforce Shifts & Operational Actions

DEMOGRAPHIC SHIFTS

Changing Applicant Pool

Expect more parents with teens 14–17 (often women), older adults 55–64, individuals experiencing homelessness, recent foster youth, and veterans — all now subject to requirements.

Consider: Do your job roles, scheduling flexibility, and support services match these demographics?

MOTIVATION SHIFTS

Meeting Basic Needs vs. Career Goals

More applicants may be motivated by maintaining benefits rather than long-term career goals. This can affect morale, retention, and curriculum effectiveness.

Consider: How will you balance immediate needs with long-term economic empowerment? Motivational interviewing approaches may help.

WELLBEING

Increased Financial Stress

Workers may show anxiety, confusion about rules, fear of losing food benefits, and absenteeism. Trauma-informed responses are essential — train all staff.

Consider: Provide on-site snacks, emergency food supplies, and connect workers to food banks and SNAP offices.

COMMUNICATION

Reduce Chilling Effects

Confusion may cause eligible workers to disenroll unnecessarily. Communicate proactively in group settings and one-on-ones. Use empathetic, non-stigmatizing language.

Consider: Build relationships with legal aid, benefits navigators, and your state SNAP agency for referrals.

OPERATIONAL PLAYBOOK

Six Actions ESEs Can Take Now

01 Gather Benefit Status at Intake

- Is the individual receiving SNAP?
- Are they subject to ABAWD rules?
- When is their recertification?

02 Accelerate Time to Employment

- Streamline application & enrollment processes to reduce wait time between application and employment/participation.
- Create an expedited enrollment pathway for those near the 3-month limit

03 Restructure Jobs & Programs

- Ensure ≥80 hrs/month of work or qualifying activities available
- Combine work + qualifying activities as needed
- Confirm ESE programming counts — get approval in writing from SNAP agency

04 Support Recertification

- Where possible, track workers' upcoming recertification dates
- Help workers interpret SNAP notices
- Offer group or 1:1 sessions on reviewing and responding to official documents

05 Assist With Documentation

- Confirm what your SNAP agency requires to document work participation
- Providing clear, timely documentation of employment and program participation
- Help workers understand reporting requirements

06 Manage Post-Graduation Gaps

- Delay exits until the current month's 80-hour requirement is met
- Strengthen job-search services and expectations
- Partner with quality employers for job placement
- Refer to organizations providing qualifying activities

Spotlight California: Work Requirements & Support Infrastructure

In California, SNAP is administered as CalFresh, implemented by county human services agencies under CDSS guidance. California has historically taken a more supportive, participant-centered approach — including broad use of exemptions and a voluntary CalFresh Employment & Training (CFET) program. Implementation details vary by county. Strong local partnerships are essential.



County CalFresh Offices

Build local relationships — implementation by [county human services agencies](#) varies significantly.



CDSS Policy Guidance

Reference California Department of Social Services (CDSS) as the authority on [CalFresh policy](#), including work requirements and CFET.



BenefitsCal

Reference [BenefitsCal](#) as the official statewide portal for CalFresh applications & ongoing case management



CalFresh Outreach Providers

In addition to official CalFresh outreach providers, ESEs can partner with Community action agencies, legal aid, community colleges & other workforce partners

Read the full brief: [Expanded SNAP Work Requirements and Time Limits: Guidance for Employment Social Enterprise Leaders](#)

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