

A primer on SNAP work requirements

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EDITOR'S NOTE

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Abstract

The Supplemental Nutrition Assistance Program (SNAP; formerly known as the Food Stamp Program) is a crucial part of the safety net in the United States, providing benefits to roughly 42 million Americans per month to maintain a nutritious diet. In 1996, work requirements in SNAP expanded, limiting the efficacy of the program to support all low-income households. In this primer, we answer frequently asked questions about SNAP work requirements, summarize rigorous research evidence, and offer key takeaways to help guide an understanding of work requirement policy, the people subject to work requirements, and features of the labor market in which these SNAP participants work. We conclude that the evidence supports largely or fully eliminating able-bodied adult without dependents (ABAWD) work requirements.

Introduction

The Supplemental Nutrition Assistance Program (SNAP; formerly known as the Food Stamp Program) is a crucial part of the safety net in the United States, providing benefits to roughly 42 million Americans per month to maintain a nutritious diet. Following welfare reform in 1996, SNAP became the only truly universal means-tested safety net program in the U.S. In that same year, however, work requirements in SNAP expanded, limiting the efficacy of the program to support all low-income households.

In general, work requirements in means-tested programs are meant to force individuals deemed “work-ready” to increase or maintain their work effort every month by withholding benefits if a person is not working a minimum number of hours, engaged in certain training or education programs, or (for some programs) actively looking for employment.

Since 1996, stringent work requirements for “able-bodied adults without dependents” (commonly referred to as ABAWDs) have been layered over pre-existing (since the 1970s) general work requirements for many working-aged adults receiving SNAP. Debate over whether to change SNAP work requirement rules has intensified in recent years. Proponents of work requirements argue they encourage more people to work, whereas critics say they create barriers to accessing SNAP without meaningfully changing work-related behavior.

There have been recent changes to SNAP work requirements. As part of the debt ceiling negotiation in 2023, the criteria for who is subject to ABAWD work requirements changed, as did the rules governing states’ ability to provide individual hardship exemptions from these requirements. These changes began taking effect on September 1, 2023, and came on the heels of the expiration of pandemic-era nationwide suspension of work requirements.

The Farm Bill—the major legislation that sets rules for SNAP—expired on September 30, 2023. Over the past several years, Congress has worked toward but failed to pass a new comprehensive Farm Bill. It is notable that none of the three major Farm Bill proposals from the last Congress—from the [House](#) and [Senate](#) Republicans and [Senate](#) Democrats—included any changes to SNAP general or ABAWD work requirements. On December 21, 2024, Congress extended the 2018 Farm Bill through September 30, 2025. This year, the Trump administration and their [cabinet](#) appointees as well as the House Republican [budget blueprint](#) and some [members](#) of Congress have proposed changes to work requirement policy for SNAP, Medicaid, and Temporary Assistance for Needy Families (TANF).

In this primer, we describe three components of SNAP work requirements: 1) the general work requirement, 2) the Employment and Training (E&T)

program, and 3) the work requirements that apply only to ABAWDs (often referred to as “time limits”). Since much of the recent policy debate and academic literature has focused on the ABAWD work requirements, we pay particular attention to them. We offer key takeaways to help guide an understanding of work requirement policy, the people subject to work requirements, and features of the labor market in which these SNAP participants work. We provide detailed answers to commonly asked questions about SNAP work requirement policy, and we summarize rigorous new research evidence on the efficacy of work requirements and SNAP at encouraging work.

Our conclusion from a review of the literature on work requirements is that the best evidence shows they do not increase employment. Moreover, this research finds work requirements cause a large decrease in participation in SNAP. This is concerning because many SNAP recipients, especially those subject to the ABAWD work requirements, have [little safety net](#) to rely on besides SNAP. Additionally, we discuss evidence that those subject to the ABAWD work requirements face difficulty meeting the requirements even if they are working or would like to work, because of the types of jobs available to them. Finally, we summarize research that suggests work requirements limit SNAP’s ability to act as an automatic stabilizer during recessions.

While we try to explain clearly what work requirement rules are in law and as regulated, in practice, the implementation of work requirements strays from these complicated rules. Rule complexity, administrative burdens, inconsistent implementation, and the realities of the low-wage labor market make it difficult to comply with the rules. Consequently, work requirement penalties—losing access to SNAP if one fails to comply—affect more people than if the rules were implemented exactly as Congress intends.

We believe that the evidence supports largely or fully eliminating SNAP work requirements at all times, but particularly during a recession and its recovery.

SNAP basics

What is SNAP?

The Supplemental Nutrition Assistance Program (SNAP; formerly the Food Stamp Program) is a universal means-tested social insurance program which supplements participating households’ grocery budgets to allow them to afford nutritious food essential to their health and well-being. The federal government [pays](#) for benefits and about 50 percent of a state’s administrative costs. States pay for about 50 percent of their administrative costs and administer the program.

SNAP is unusual in the landscape of the U.S. safety net because it provides benefits regardless of

[household structure](#); e.g., even low-income households without children can be eligible. Participating households receive an EBT (electronic benefit transfer) card, which functions as a debit card for their benefits. Benefits are loaded onto these cards once a month. Benefits can be spent at the more than 250,000 [participating](#) stores that sell food to be prepared at home, including certain [online](#) retailers, and [farmers markets](#).

Who is eligible for SNAP?

The basic eligibility rules to qualify for SNAP are gross income below 130 percent of the poverty line and income net of SNAP-allowable deductions below 100 percent of the poverty line. For fiscal year 2025, these [income limits](#) for a household of three in the contiguous U.S. are \$2,798 and \$2,152 per month, respectively. Additionally, Broad-Based Categorical Eligibility gives states the option (that most states take) to increase the gross income eligibility threshold up to 200 percent of the poverty line for SNAP recipients receiving support from other government programs.

In fiscal year 2024, an average of 41.7 million people received SNAP benefits each month. Figure 1 describes the characteristics of SNAP participants who reported in March 2024 that they participated in the program at some point in 2023. The majority of SNAP participants are children (36 percent) and those 60 and older (19 percent). Among participants who are of working age (ages 18–59), approximately 24 percent are veterans, students, or have a disability. Another 38 percent of working age participants have a dependent under age 18 (nearly half of whom have dependents under six years old).

Among eligible households, monthly benefit amounts are determined based on net income and household size, using a formula that assumes that a household spends 30 percent of its net income on food. Households with no net income to spend on food receive the maximum benefit amount, and as a household's income increases, its benefit amount falls. SNAP eligibility is not strictly conditional on work for all beneficiaries, unlike programs like the Earned Income Tax Credit. However, SNAP's universality diminishes from the imposition of work requirements that apply to various groups of beneficiaries.

What financial assets do SNAP-eligible households have?

Levels of savings are low across many U.S. households; only [63 percent](#) of all households have enough cash saved to cover an unexpected \$400 expense, and only [54 percent](#) of all households have three months' worth of expenses in savings. Unsurprisingly, SNAP households are even more financially constrained.

For households with annual incomes below \$25,000 in 2021 (those most likely to be eligible for SNAP), only [29 percent](#) could cover an unexpected \$400 expense using cash or a credit card that they will pay off immediately (savings-reliant methods). A \$400 expense is a relatively low emergency expense; the average cost of an unexpected [car repair](#) is \$500–600 and an [emergency room visit](#) at a hospital can cost up to \$1,300.

[Research](#) further suggests that SNAP applicants tend to experience drops in earnings around when they apply for benefits. SNAP benefits are integral to these households who don't have sufficient savings to independently weather financial shocks. For those with low levels of savings, these benefits help households to avoid longer-lasting financial harm by setting them up to avoid missing payments on bills or rent. One [recent paper](#) even finds that credit usage and past due balances increased after the reintroduction of SNAP work requirements after the Great Recession led many people to lose SNAP benefits, illustrating SNAP's importance to households in avoiding financial harm.

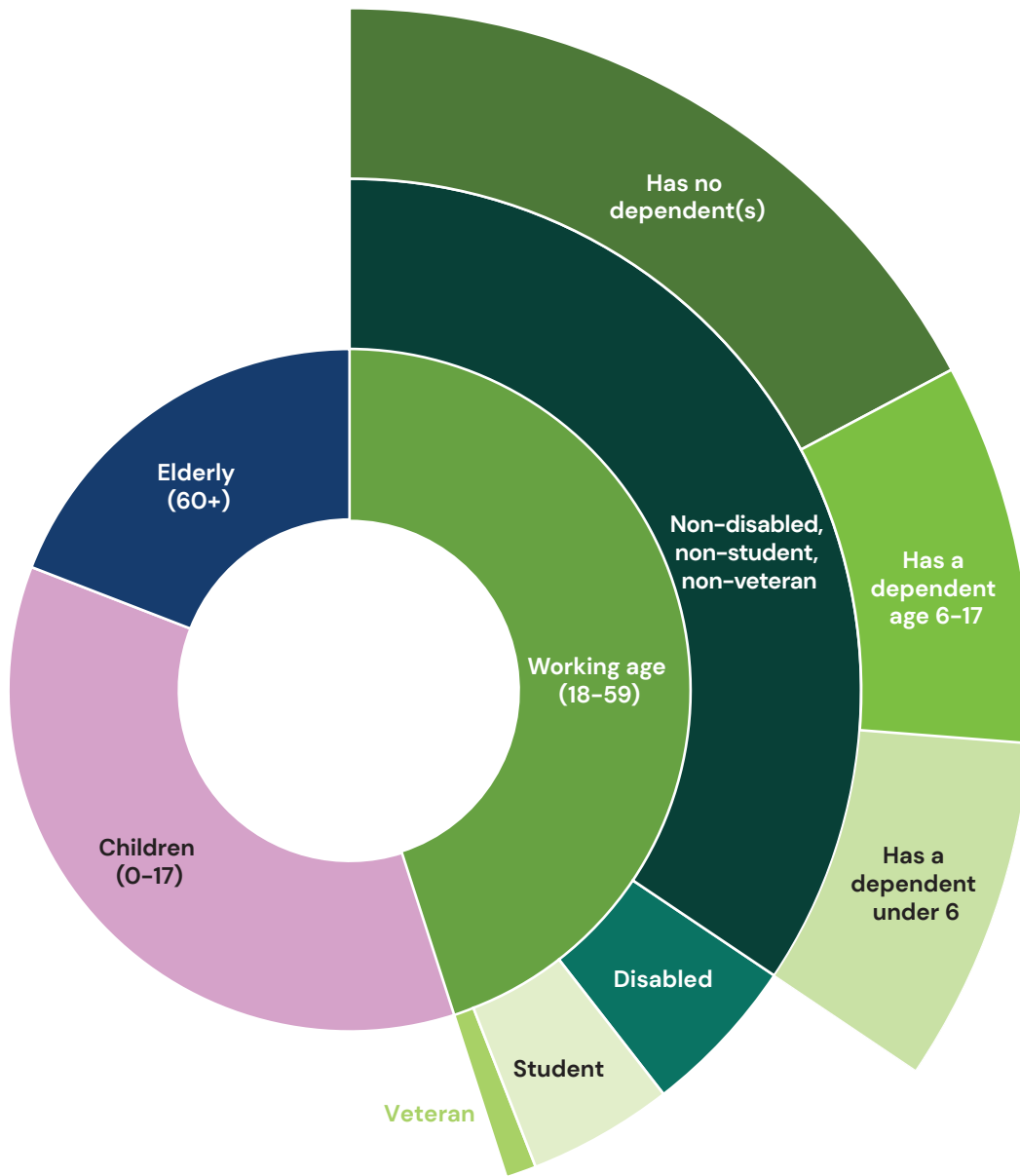
How are SNAP benefits calculated? What is the Thrifty Food Plan?

The maximum monthly benefit is determined using the Thrifty Food Plan (the Thrifty), developed by the United States Department of Agriculture (USDA), which estimates the cost of a healthy diet at a low price point. For a household of three, the maximum monthly benefit is [currently](#) \$768. Most households receive less than this: The national [average monthly](#) benefit in December 2024 was \$355.2 per household.

While the Thrifty is adjusted annually to keep up with food costs, the underlying food package has historically been reexamined irregularly. In the 2018 Farm Bill, Congress directed USDA to recalculate the Thrifty by 2022 and subsequently at a regular five-year interval. The congressionally-directed reevaluation of the Thrifty in 2021 accounted for not only changes in food prices, but also changes in Americans' diet patterns, advances in nutrition science, and changes in dietary guidance. As during [the 2006 Thrifty reevaluation](#), USDA determined again during the 2021 that it was no longer possible to purchase an adequate diet at the 1960s' minimal cost. Unlike in 2006, USDA opted to modernize the food package, resulting in a 21 percent increase in the maximum SNAP benefit, implemented as a COVID-era 15 percent increase in benefits sunset.

[Evidence](#) suggests that the Thrifty reform reduced the number of people in poverty by 2.3 million in late 2021, and this anti-poverty effect is likely larger now that other pandemic-era safety net expansions have expired.

FIGURE 1
Characteristics of SNAP participants, 2023



Source: Bureau of Labor Statistics 2024; authors' calculations.

Note: Population is limited to the civilian citizen population who reported on the CPS ASEC (fielded March 2024) that they were SNAP participants at some point in 2023. Each person is assigned one demographic category based on the following order: receives disability benefits, is a student, is a veteran. For example, if someone is both a student and a veteran they will be counted in the student category and not in the veteran category. These data cannot identify those who are pregnant, homeless, or youth who have aged out of foster care.



SNAP work requirement policy

What are general work requirements for SNAP participants?

The [general](#) work requirement in SNAP applies to many SNAP recipients aged 16–59. There are several specific groups that are exempt: those already working at least

30 hours per week or having weekly earnings equivalent to 30 hours of minimum-wage work, meeting work requirements for another program like TANF or Unemployment Insurance (UI), taking care of children under six or an incapacitated person, with a physical or mental disability, participating in a drug or alcohol rehabilitation program, or enrolled in school or a training program at least half-time. Those subject to these requirements

are called “work registrants,” and they must not turn down a suitable job offer, voluntarily quit a job, or voluntarily reduce hours below 30 hours per week.

Failure to meet these general work requirements disqualifies people from receiving SNAP for at least one month. Those subject to the general work requirement may additionally be referred to participate in the state’s E&T program. Work registrants who are also designated as ABAWDs will be subject to the much stricter ABAWD work requirements, which we describe in detail below, in addition to the general work requirement. According to SNAP Quality Control data, around 35 percent of SNAP receiving households are likely subject to the general work requirements.

What is the Employment and Training program for SNAP participants?

Work registrants can be referred to the state’s employment and training program, SNAP E&T (Employment and Training).

States are required to implement a SNAP E&T program, but the nature of the program varies by state. Components of the program can include workfare, work experience or training, educational programs, self-employment programs, job retention, or job search. This flexibility is intended to allow states to [develop programming](#) to best meet the needs of local labor markets. States may use third-party partnerships to operate their programs. SNAP Quality Control data suggests that roughly one in five SNAP-receiving households are potentially subject to E&T programs.

[States](#) are not required to provide enough slots in their programs for all interested participants, unless the state is a “Mandatory E&T” state. [States](#) that have mandatory programs must provide sufficient E&T slots for referred participants because failure to comply in the *first month* of SNAP receipt in states with mandatory E&T results in expulsion from the program. This optional state policy route can result in work registrants losing SNAP benefits and ABAWD individuals losing SNAP benefits before the three months under the ABAWD work requirement. Most states operate voluntary E&T only in parts of the state or provide less than 20 hours a week of services. In practice, this means that many ABAWDs who would like to or try to meet the work requirement through this avenue are unable to do so because there is insufficient availability.

[Cook and East](#) have collected information on whether the state has a mandatory or voluntary E&T program. If mandatory, those referred to E&T must complete the program in order to comply with the general or ABAWD work requirement and avoid sanction. If voluntary, work registrants referred can choose whether to complete the E&T program and will not be sanctioned if they choose not to. Other states have a

combination of mandatory and voluntary programs. In these states, participation in E&T is mandatory for those who are referred in order to continue to receive benefits, but non-referred individuals may participate in the program if they wish.

In 2023, three states had only a mandatory E&T program and an additional six states had combination of voluntary and mandatory E&T programs (figure 2). Research on the general work requirement and E&T is very limited, but a recent paper by one of the authors of this piece provides important new evidence that neither program increases work, discussed in more detail below.

What does “ABAWD” stand for?

An ABAWD is an “able-bodied adult with dependents.” “Able-bodied” means that a person is determined to be physically or mentally able to work. “Without dependents” means that the person does not claim a child or other qualifying adult as a dependent on their [tax returns](#). If a non-custodial parent lives (and eats) with a minor child, then they are not considered to be an ABAWD. ABAWDs do not include those who are pregnant.

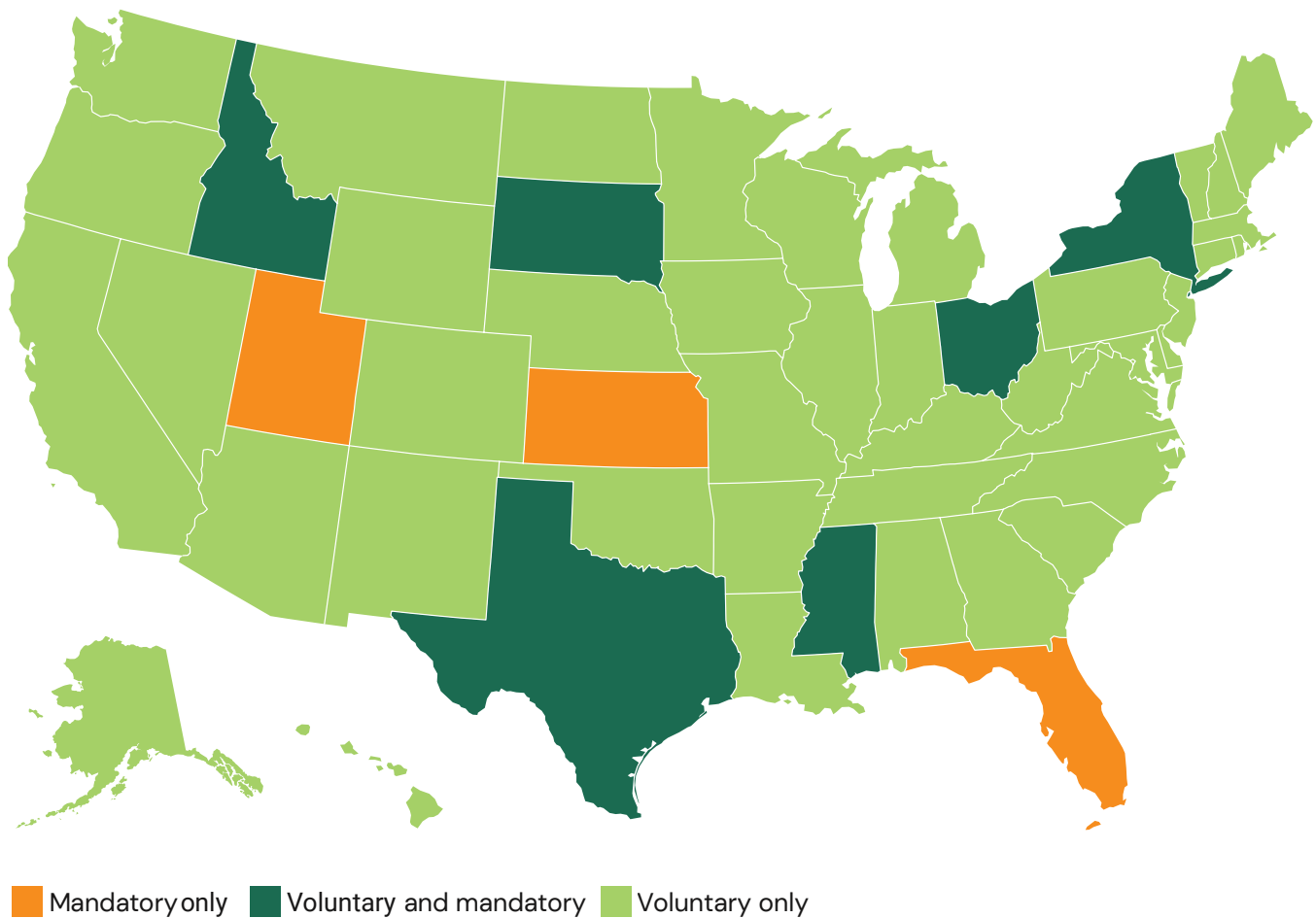
Prior to September 2023, those between the ages of 18 and 49 were considered “adults” for ABAWD work requirements and thus subject to this requirement. This definition of “adult” recently changed, as the Fiscal Responsibility Act of 2023 increased the age range from 18 to 49 to 18 to 52 as of October 1, 2023 and to 54 as of October 1, 2024. The age range will revert to 18 to 49 in 2030.

Defining an ABAWD may seem clear; but, it is not straightforward to document that one is or is not an ABAWD. This required documentation generates costs that are borne by applicants and SNAP administrators. In addition to checking for the presence of dependents, children, or pregnancy, applicants seeking to document that they are not an ABAWD due to a disability must submit [documentation](#) of a physical or mental limitation from a qualifying medical professional, be documented as unfit to work by a program caseworker or state agency, or receive disability benefits.

While states are required to keep track of the number of ABAWDs on the SNAP rolls and the details of whether they are subject to the time limit, meeting work requirements, or are exempt for an allowable reason, this information is not publicly available. The SNAP Quality Control data show that about 6 percent of SNAP recipients are ABAWDs, regardless of whether they are actively subject to the work requirements. This translates to about 2.5 million of the 41.2 million SNAP recipients in 2022 (the latest year the data are available).

FIGURE 2

SNAP E&T programs, by mandatory and/or voluntary, 2024



Source: USDA 2024.



BROOKINGS

Who are ABAWDs?

There are a few prevailing stereotypical images of a low-income ABAWD—most [famously](#) of an unemployed single white man living with his parents who spends his days playing video games. In an [analysis](#) for The Hamilton Project, Lauren Bauer, Bradley Hardy, and Olivia Howard provide extensive evidence, summarized below, that the ABAWD stereotype does not hold. We revise and update these estimates for reference year 2021 below (SIPP 2024).¹

1. For these estimates, we report all waves in the 2023 SIPP data release, including Wave 1 from the 2023 Panel, Wave 2 from the 2022 Panel, Wave 3 from the 2021 Panel, and Wave 4 from the 2020 Panel, all of which report data for reference year 2021 (See figure 1-2 in the [2023 SIPP User Guide](#)). In the earlier publication, they only report estimates from Wave 1 of the most recently released year. In this publication, we also define individuals who live in households under 200 percent of the federal poverty line using the `thcyncpov` variable, where according to the 2023 [SIPP User Guide](#), “values are based on the annual sum of the individual’s monthly total [...] household [...] income divided by the annual sum of the individual’s monthly poverty thresholds (reflecting changing family or household composition

They find that roughly half of low-income ABAWDs are women, and that low-income ABAWDs are disproportionately people of color. The “able-bodied” moniker masks health issues, while the “without dependents” designation misses some parents and some people who care for elderly adults or individuals with disabilities. This status is not static: There is more churn into and out of being an ABAWD than is commonly understood; for example, ABAWDs could typically work but be temporarily disabled without a job.

Low-income ABAWDs are not necessarily “able-bodied.” They struggle with their health. Nearly 36 percent of ABAWDs living under 200 percent of the federal poverty line report having a disability, and 29 percent report that a disability affects their ability to work. A striking 53 percent of low-income ABAWDs who never entered the labor force in 2022 self-reported a

over the reference period). The resulting annual values are then divided to calculate the individual’s annual income-to-poverty ratio.”

disability, and 88 percent of that group claimed their disability affected their attempts to work. Among ABAWDs who were employed all 12 months of 2022, 27 percent report a disability, and 49 percent of that group report that their disability impacts their work.

Low-income ABAWDs are not necessarily “with-out dependents.” They are parents and a part of families. ABAWDs are not an island unto themselves; they may draw upon family members for financial support, or instead find themselves in the position of providing support for family members in need of assistance, including their children. Policies that exclude ABAWDs can inadvertently place more economic pressure on members of their familial and social network. About 39 percent of low-income ABAWDs are parents. While most ABAWDs who are parents have adult children, approximately 4 percent of low-income ABAWDs are noncustodial parents (i.e., parents to a child under age 21 who does not live in their household).

What are SNAP work requirements for so-called ABAWDs?

On top of the general work requirement, there is an additional work requirement that applies to “able-bodied adults without dependents (ABAWDs).”

In 1996, new work requirements were imposed on a subset of SNAP recipients—so-called “able-bodied adults without dependents,” or ABAWDs. ABAWDs are SNAP participants between the ages of 18 and 54 who are able to work, do not have dependents, and do not meet other exemption criteria (like being veterans). If ABAWDs are not exempt, they must meet requirements for minimum work activity and requirements for reporting this activity, otherwise they are eligible to receive only three months of SNAP benefits within a 36-month period. ABAWDs have to show that they do at least 80 hours per month of employment or job training; notably, time spent searching for work does not count towards this requirement (as it does with other programs such as UI).

ABAWDs cannot receive SNAP benefits if they do not meet an 80-hour per month work or training effort threshold after three (consecutive or inconsecutive) months. If an ABAWD is not able to document that they meet work requirements, then they have to wait until the end of the three-year period to be eligible again. SNAP work requirements are unique among the landscape of work requirements in the U.S. because the rules do not allow *job search* to count as work effort.

While we discuss exemptions and waivers in detail below, we note that states have a limited number of individual hardship exemptions to issue each month for ABAWDs. In addition, governors can request waivers from work requirements for all ABAWDs in areas where there is evidence of lack of sufficient jobs. Finally, Congress can suspend work requirements and

did so during part of the Great Recession and during the COVID recession.

What activities satisfy the ABAWD work requirements?

Those who are subject to work requirements must prove monthly that they are meeting the requirements. To satisfy work requirements and continue receiving SNAP, ABAWDs must prove that they work at least 80 hours per month (20 hours per week). This work can be paid or unpaid (e.g., volunteering). Besides work, other activities can satisfy this requirement:

- documenting each month that they work or participate in a qualifying work or education program for an average of 20 hours per week;
- participating in a work program through SNAP or another federal, state, or local work program for the number of hours assigned to the recipient each month (the number of hours will depend on the amount of the recipient’s SNAP benefit); or,
- participating in a combination of work and a work program if the hours total to at least 80 hours a month.

Notably, job search activity does not satisfy the ABAWD work requirement, which is an unusual feature of these work requirements compared to other programs in the U.S.

What changed to ABAWD work requirements in the debt limit deal in June 2023?

In [June 2023](#), the Fiscal Responsibility Act of 2023 (also known as the deal over the debt ceiling or FRA) made the first changes to who is categorically subject to ABAWD work requirements (outside of recessions) since 1996.

This law [changed](#) who is subject to and exempt from the ABAWD work requirement. The law raised the age at which individuals can be subject to the ABAWD work requirements. The age range gradually increased from ages 18–49 to ages 18–54 by October 2024, subjecting people aged 50 to 54 to the ABAWD work requirements for the first time.

In addition, the law created new exemptions to the ABAWD work requirements for people (regardless of their age) who are:

- homeless;
- veterans; or,
- people who have been in foster care and are under the age of 25.

These individuals are newly exempt from the ABAWD work requirements if they can provide documentation of this status, which is not a given. The age range will go back to 18 to 49, and these new exemptions will be sunset, in 2030.

Finally, the FRA reduced the number of individual monthly exemptions states can give from the ABAWD work requirements, lowering it from roughly 12 percent of a state's ABAWD caseload to roughly 8 percent. (The 2018 Farm Bill had already reduced the annual share of SNAP participants that could receive an individual exemption from 15 percent of a state's ABAWD caseload to 12 percent.) The FRA also contains a provision under which states are no longer allowed to "roll over" monthly hardship exemptions into the next fiscal year if their exemptions are not used up in the current fiscal year, a change that does not sunset in fiscal year 2030.

In scoring these provisions of the FRA, the Congressional Budget Office (CBO) estimated that approximately 78,000 people on net would be newly enrolled in SNAP over a ten-year period. The net effect reflects both a reduction in enrollment from people aged 50–54 newly subject to the work requirements, and an increase in enrollment from veterans, homeless people, and youth aging out of foster care who are newly exempt from these requirements. As a result, CBO estimates that direct spending on SNAP would increase by \$2.1 billion over the 2023–33 period. These estimates are highly uncertain, however, since the new rules began taking effect in September 2023, and quantifying the size of each group affected is not straightforward.

How do exemptions from ABAWD work requirements work?

Certain ABAWDs are exempt from the work requirement based on their individual characteristics or whether they spend enough time in a qualifying activity. Additionally, states can apply for place-specific waivers from ABAWD work requirements based on local labor market conditions; we describe place-based waivers in more detail below. Finally, since 1997, states have also been able to provide a certain number of hardship exemptions to ABAWDs each month.

States have discretion with how to use these individual hardship exemptions. The number of exemptions that a state can accrue for potential use is based on the size of the states' ABAWD population. Even if an individual is exempted from the ABAWD work requirement, they may still be subject to the general work requirement.

Categorical exemptions, like those for homeless people, do not always work as they are intended. The more complicated an exemption is, the more difficult it is for SNAP applicants and recipients to prove they

meet it and for SNAP caseworkers to verify their status. The rules and paperwork requirements keep some people who should be exempt from getting their exemption and thus put in jeopardy their ability to receive SNAP benefits.

Today, what is the complete list of categorical exemptions from ABAWD work requirements?

If an individual is deemed exempt from the general work requirement, then they are also exempt from the ABAWD work requirement. In expectation (but not practice) the exemptions from the general work requirement are:

- A caregiver to a child under age six or to someone who is incapacitated;
- Those with a medically-determined disability, i.e., those who are unable to work due to a physical or mental limitation. This can be proven by receiving Supplemental Security Income or Social Security Disability Insurance, being determined to be disabled by an eligibility specialist, or being otherwise medically certified as being physically or mentally unfit for work;
- Those meeting work requirements for another program (TANF or unemployment compensation);
- Those participating in an alcohol or drug treatment program; and
- Eligible students (for whom there are additional complex rules to satisfy in order to qualify for SNAP).

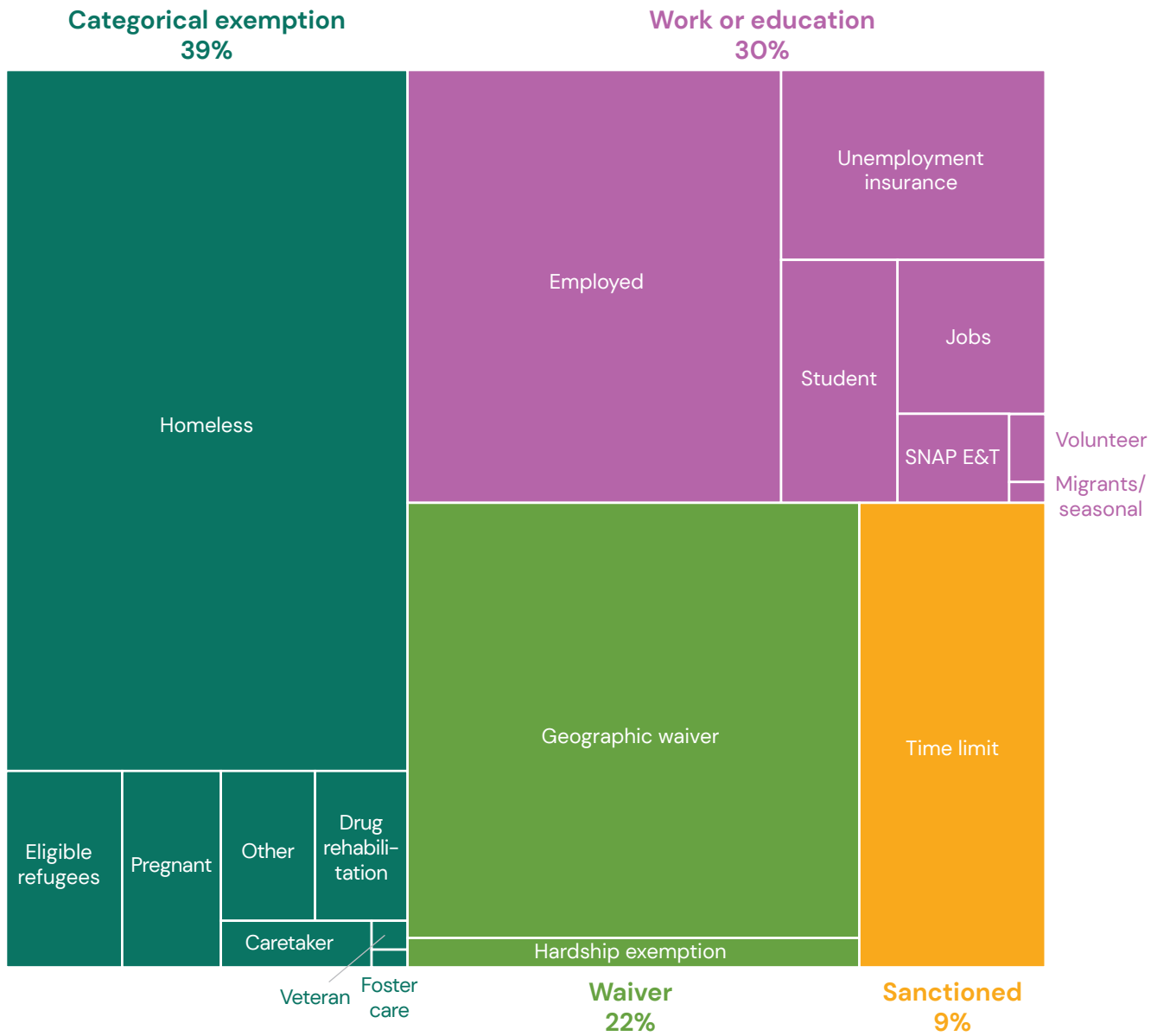
Additionally, there are several specific groups that are exempt from the ABAWD work requirements, but not the general work requirements:

- Those with someone under 18 in their "SNAP household;"
- Those who are homeless;
- Veterans; and,
- Those who have been in foster care and are under the age of 25.

States vary in how closely they check that applicants meet the general work requirement exemption criteria. As a result, there are some participants who are subject to the ABAWD work requirement when they should be exempt from both the general and ABAWD work requirements. For example, if a SNAP recipient is also receiving UI and meeting the job search requirements for the UI program, they should be exempt from the general work requirement and thus the ABAWD requirement as well. However, if they are not screened fully for the general requirement, they may be erroneously subject to both requirements.

FIGURE 3

Distribution of ABAWDs in Arizona, January–September 2024



Source: Arizona Department of Economic Security 2024.

Note: This information was obtained via Freedom of Information Access request. There is a difference of 3,199 individuals between the number of ABAWDs in Arizona (215,249) and the total of those subject to the time limit (19,942) plus those with exemptions (192,108).



Figure 3 shows the distribution of ABAWDs into these categories for the state of Arizona from January through September 2024. Ninety-one percent of Arizonan ABAWDs were not subject to sanction because they were meeting work requirements, had a categorical or hardship exemption to either the ABAWD or general work requirement, or lived in a location with a waiver. Nine percent of Arizonan ABAWDs—about 20,000 people—were subject to the time limit and were therefore not receiving benefits.

What are place-based work requirement waivers?

Since 1996, states and areas within a state are eligible for area-wide waivers from the ABAWD work requirements when there is evidence of a “lack of sufficient jobs” in the state or local labor market. The intent of a work requirement waiver is to ensure that at times when and in places where it is difficult to find work, ABAWDs are not penalized for not meeting the work requirement. These waivers exempt all ABAWDs in that

area from work requirement rules and penalties, including those who have already come under sanction.

What evidence of a weak labor market must a state provide to USDA to qualify for a place-based waiver?

States must apply to USDA for place-based waivers (except when work requirements are suspended by Congress as discussed below). A request to USDA to waive work requirements in a specified area must be accompanied by analysis that shows empirical evidence of either a lack of sufficient jobs in the labor market or a very high unemployment rate (10 percent or more) in that place.

As there is no one way to identify the conditions that make it difficult to secure employment, there are several measures of labor-market weakness (“lack of sufficient jobs”) in the current ABAWD work requirements rules that are used to determine whether a local or state area qualifies for a waiver.

The state must be able to provide evidence that the state or a state-determined sub-state area:

- has a recent 12-month average unemployment rate over 10 percent;
- has a recent three-month average unemployment rate over 10 percent;
- has a historical seasonal unemployment rate over 10 percent;
- is designated by the U.S. Department of Labor as a Labor Surplus Area (LSA);
- qualifies for Extended Benefits to Unemployment Insurance (EB);
- has a low and declining employment-to-population ratio;
- has a lack of jobs in declining occupations or industries;
- is described in study or other publication as an area where there is a lack of jobs; or
- has a 24-month average unemployment rate 20 percent above the national average for the same period, starting no earlier than the start of the LSA designation period for the current fiscal year.

A state qualifies for EB if the state has:

- a 13-week Insured Unemployment Rate (IUR) that is at least 5 percent and equals at least 120 percent of the IUR for both of the last two years;
- a 13-week IUR of at least 6 percent; or
- a 3-month Total Unemployment Rate (TUR) that is at least 6.5 percent and at least 110 percent of the TUR for either of the last two years.

The IUR reports the share of people currently receiving UI among the labor force participants who are covered by UI. The TUR is the share of unemployed in the labor force.

During the Great Recession, an additional criterion for a waiver was added on a temporary basis. Congress enacted Emergency Unemployment Compensation (EUC), a temporary program that extended the amount of time during which an eligible UI participant could receive UI benefits. Congress authorized EUC on June 30, 2008, extending the expiration date to January 1, 2014 in the American Taxpayer Relief Act of 2012. The Bush administration clarified on January 8, 2009 that eligibility for particular tiers of EUC also qualified states for SNAP work requirement waivers. While EUC was in place, ABAWD work requirements were waived.

What areas can a place-based waiver cover?

A state agency or governor can submit a request to waive the ABAWD work requirements for a specific geographic area.

States are able to flexibly identify areas that meet the criteria for a waiver in order to best serve SNAP recipients. States are permitted to apply to the USDA for waivers to the time limit provisions for the entire state, as well as for sub-state geographic areas, if their economic conditions meet certain standards. Provided that a state can produce the necessary analysis regarding the areas’ labor market characteristics and show that within a selected area the labor market conditions warrant a waiver, states have substantial discretion for designating waiver areas. In addition to recognizable geographies like cities, counties, Indian reservations, and labor market areas, the state can group together contiguous areas, or non-contiguous areas belonging to a state-recognized economic region.

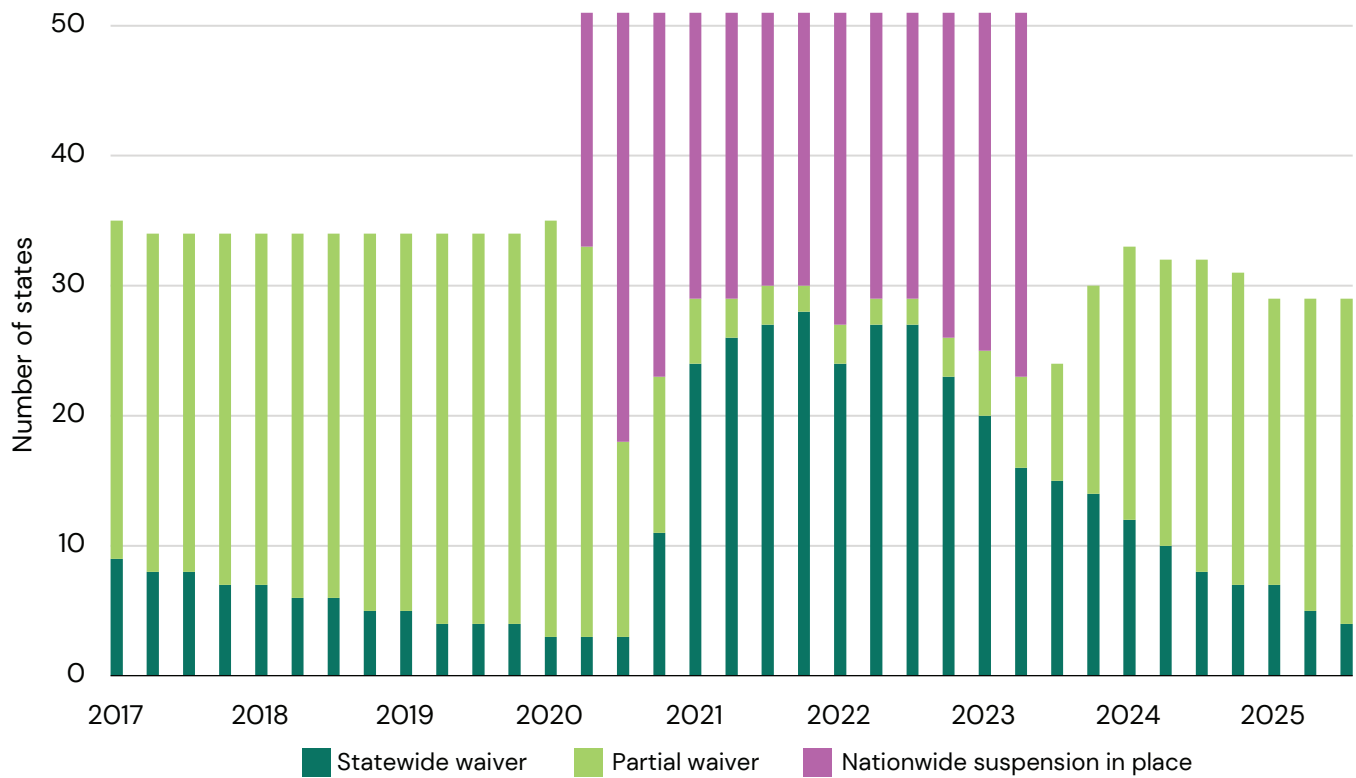
How widespread are ABAWD work requirement waiver requests?

Since 2007, at some point all 50 states and the District of Columbia have requested and received a state-wide or partial state work requirement waiver. In addition, Congress has suspended work requirements at points during the Great Recession and COVID recession. Recent analysis [confirms](#) that waiver usage is countercyclical.

Figure 4 shows which states had approved state-wide or partial state work requirement waivers from fiscal year 2017 through the third quarter of fiscal year 2025. [In the third quarter of 2025](#), three states (California, Illinois, and Nevada) and D.C. have a state-wide waiver and 25 states (Alaska, Arizona, Colorado, Connecticut, Delaware, Hawaii, Kentucky, Maine, Maryland,

FIGURE 4

Quarterly SNAP waivers or suspensions, FY 2017–FY 2025 Q3



Source: USDA n.d.; authors’ calculations.

Note: Data are collected using the quarterly summaries provided by the USDA on their website. These summaries are updated as of the first day of each fiscal quarter, meaning the figure reflects data from October 1, 2017 to April 1, 2025. The District of Columbia is included.



Massachusetts, Michigan, Minnesota, Montana, New Hampshire, New Jersey, New Mexico, New York, North Dakota, Oregon, Pennsylvania, Rhode Island, South Dakota, Virginia, Washington, and Wisconsin) have partial state waivers. [Some](#) states are now prevented by state law from requesting waivers.

While Congress [suspended](#) work requirements nationwide during the COVID recession from April 2020 through June 2023, this figure shows that some states stayed up-to-date with their waiver paperwork during the suspension period. During the suspension time-period, the vast majority of states that were keeping up with their paperwork were eligible for a state-wide waiver.

When has Congress historically suspended work requirements?

Congress has suspended SNAP work requirements nationwide during each of the past two recessions.

In the American Recovery and Reinvestment Act, Congress authorized a nationwide SNAP work requirement suspension from February 17, 2009 through

September 30, 2010. While a few localities declined this authorization, every place in the United States was eligible without having to provide documentation.

Similarly, one of the first federal actions taken at the onset of the COVID-19 pandemic was to suspend SNAP’s ABAWD work requirement nationwide. The nationwide suspension was in effect for as long as the U.S. was operating under a public health emergency: from April 1, 2020 through June 30, 2023. When work requirements were suspended, a state [could](#) reimpose work requirements only if they offered an E&T slot to all participants subject to the ABAWD work requirement.

Following the reinstatement of SNAP work requirements at the sunset of the nationwide public health emergency, states were allowed to restart the time-limit clock on all recipients who are subject to these limits. Specifically, states could 1) reset the 36-month clock for the entire ABAWD caseload starting in July 2023 or 2) keep the 36-month clock as it was but remove all prior months that would otherwise be countable towards the three-month time limit for ABAWD cases. Thus, for SNAP recipients who faced a new three-month time limit following the end of the public health emergency, October 2023 was the first month

in which ABAWDs could stop receiving benefits for failure to document compliance.

What did the first Trump administration try to do to place-based waivers?

The first Trump administration was vocal about its desire to expand work requirements under SNAP and other safety net programs.

In December 2018, after Congress passed a Farm Bill that made no changes to work requirements, USDA issued a notice of proposed rulemaking that would change the conditions under which a state could apply for a place-based waiver to the ABAWD work requirements.

The notice proposed several modifications, including that:

- There could be no statewide waivers granted, unless a state qualified for EB;
- States could no longer determine the substate geographies a waiver could cover;
- An unemployment rate of less than 10 percent in a recent three-month period could only serve as evidence of a weak labor market in “an exceptional circumstance” (p. 983), such as “the rapid disintegration of an economically and regionally important industry or the prolonged impact of a natural disaster” (p. 985); and
- The so-called “20 percent rule” could be applied only if an area has an average unemployment rate that is at least 20 percent above the national average and is at least 7 percent for a recent 24-month period.

The notice also proposed eliminating a state’s capacity to bank unused individual exemptions to work requirements.

The Hamilton Project submitted a [comment](#) to this rule, arguing that the proposed rule was arbitrary, that the Regulatory Impact Analysis failed to model the effects correctly or to consider a sufficiently complete set of cost and benefit analyses, and that the rule would weaken the safety net and the countercyclical tenets of the SNAP program. In addition, The Hamilton Project wrote [several papers](#) on the negative consequences of implementing this rule, and its then-Director Jay Shambaugh [testified](#) before Congress on the subject.

The final rule that resulted from the notice and comment process limited the economic conditions that would qualify an area for a waiver, put a 6 percent national unemployment rate floor under the 20 percent rule, and removed EB as a means for a state to qualify for waivers (which was not part of the original notice).

In March 2020, a U.S. District Court [issued](#) a preliminary injunction temporarily halting the rule’s implementation. In October 2020, the court ordered USDA

to [vacate](#) the rule, which means that it would never go into effect.

Where might the second Trump administration and Congress go with work requirement policy?

There have been proposals to change who is subject to ABAWD work requirements. [Some](#) have called for applying ABAWD work requirements to all parents, while [others](#) have [called](#) for expanding these work requirements to parents of older children, between the ages of 7 and 17. Each of these proposals would apply work requirements to individuals; for example, SNAP-participating parents of a seven-year-old would both have to meet a work requirement or be subject to sanction.

[Some](#) have called to expand work requirements to 55–9 year-olds while [others](#) have called for an expansion to 55–64 year-olds. [Some](#) have called to eliminate exemptions for the population who became newly exempt in the 2023 debt ceiling deal: homeless people, veterans, and those 24 and younger who were in foster care.

There have been proposals to change SNAP work requirement waiver policy. On the regulatory front, [some](#) have [called](#) for the reintroduction of the 2019 Trump administration waiver rule. On the legislative front, [some](#) have called for Congress to limit the criteria for lack of sufficient jobs evidence and to limit state’s ability to define areas over which qualifying evidence can be calculated; [legislation](#) to this effect has been introduced. [Others](#) have called for Congress to eliminate waivers entirely.

Finally, [some](#) have called for expanding mandatory E&T.

Are there similar work requirements in other key safety net programs?

The U.S. has increasingly emphasized support to workers through programs that embed work requirements. This includes the Earned Income Tax Credit and the Child Tax Credit, which requires at least some work hours and earnings to qualify. Similarly, UI requires individuals to have sufficient work history to qualify and requires recipients to actively search for a new job to retain benefits.

Below we highlight key moments in work requirement policy in two programs besides SNAP: TANF and Medicaid. This is not an exhaustive treatment of work requirements in other safety net programs, but highlights that the debate over work requirements is not constrained to SNAP alone.

The shift in the 1990s toward requiring work as a condition to receive safety net benefits affected

programs beyond SNAP. One of the most important cash safety net programs—Aid to Families with Dependent Children (AFDC)—was replaced with TANF in 1996 also as part of welfare reform. Strict work requirements were a [key part](#) of the new TANF program. Because of work requirements, time limits, other restrictions on benefit receipt, and the conversion of this assistance from an entitlement program to a block grant with fixed federal funding levels that don't increase during recessions, participation in the TANF program is much lower today than participation under its precursor. And, the program no longer acts as an effective automatic stabilizer during [recessions](#).

During the first Trump administration, adding work requirements to Medicaid was a part of the Affordable Care Act repeal discussion. In addition, [13 states](#) received federal approval for section 1115 waivers which included work requirements. The exact requirements and population subject to these requirements varied by state, but in general amounted to about 20 hours/week, with some states only adding work requirements for adult populations newly covered under expanded Medicaid and others applying these requirements to a subset of the non-expansion population.

Only one state—Arkansas—actually implemented Medicaid work requirements in this period. The requirements led to [large-scale disenrollment](#) in just the first 10 months before a federal judge [suspended](#) the work requirement, concluding that the requirements would limit health coverage and counteract a “core objective” of the Medicaid statute.

When the Biden administration took office, all previously approved Section 1115 waivers involving work requirements were revoked (or rescinded by states), and no pending waivers were approved. During the debt ceiling debates in spring 2023, [some lawmakers](#) proposed work requirements for Medicaid recipients, but this was left out of the [bill](#) that was eventually signed into law. However, a waiver instituting a somewhat different work requirement, tied to a limited, new Medicaid expansion, took effect in [Georgia](#) in July 2023 after a federal court overturned the federal government's denial of that waiver.

The landscape of Medicaid work requirements is changing; work-requirement-related 1115 waiver statuses can be monitored [here](#).

Some [members](#) of the 119th Congress have introduced legislation for a federal Medicaid work requirement, and there has been considerable discussion of including such a policy in a broader reconciliation bill. (In 2017, the Senate Parliamentarian [ruled](#) that Medicaid work requirements would survive the Byrd bath.) [Critical members](#) of the Trump administration have expressed support for adding work requirements to Medicaid.

What is the relationship between the low-wage labor market and SNAP work requirements?

Because SNAP is a means-tested program, individuals who meet income eligibility requirements are people who earn relatively low wages and those who do not work at all. Research shows that the low-wage labor market that SNAP recipients work in is much more volatile than the labor market for the middle class. That volatility makes it hard for SNAP recipients to find work and to work enough hours to meet the arbitrary work requirement threshold. Indeed, most working-age SNAP recipients who can work either already do work or would like to work more than they do, but may not be able to find employment that satisfies the work requirements.

Our interpretation of the research evidence, a literature to which we have contributed, is that SNAP work requirements do not assist adults in obtaining employment. Furthermore, work requirements do not spur increased work effort that would lead to higher earnings. Notably, we discuss new evidence below that shows low-wage workers use SNAP as insurance to help them weather hardships and this insurance actually allows them to work more in the longer-run.

Why do low-wage workers participate in SNAP?

In new [research](#), Cook and East investigate why and when individuals choose to apply for SNAP and what the effects of being granted SNAP are on their employment and earnings. They find that overall, SNAP has no large negative impacts on work.

How does this research come to the conclusion that SNAP does not reduce participant's work?

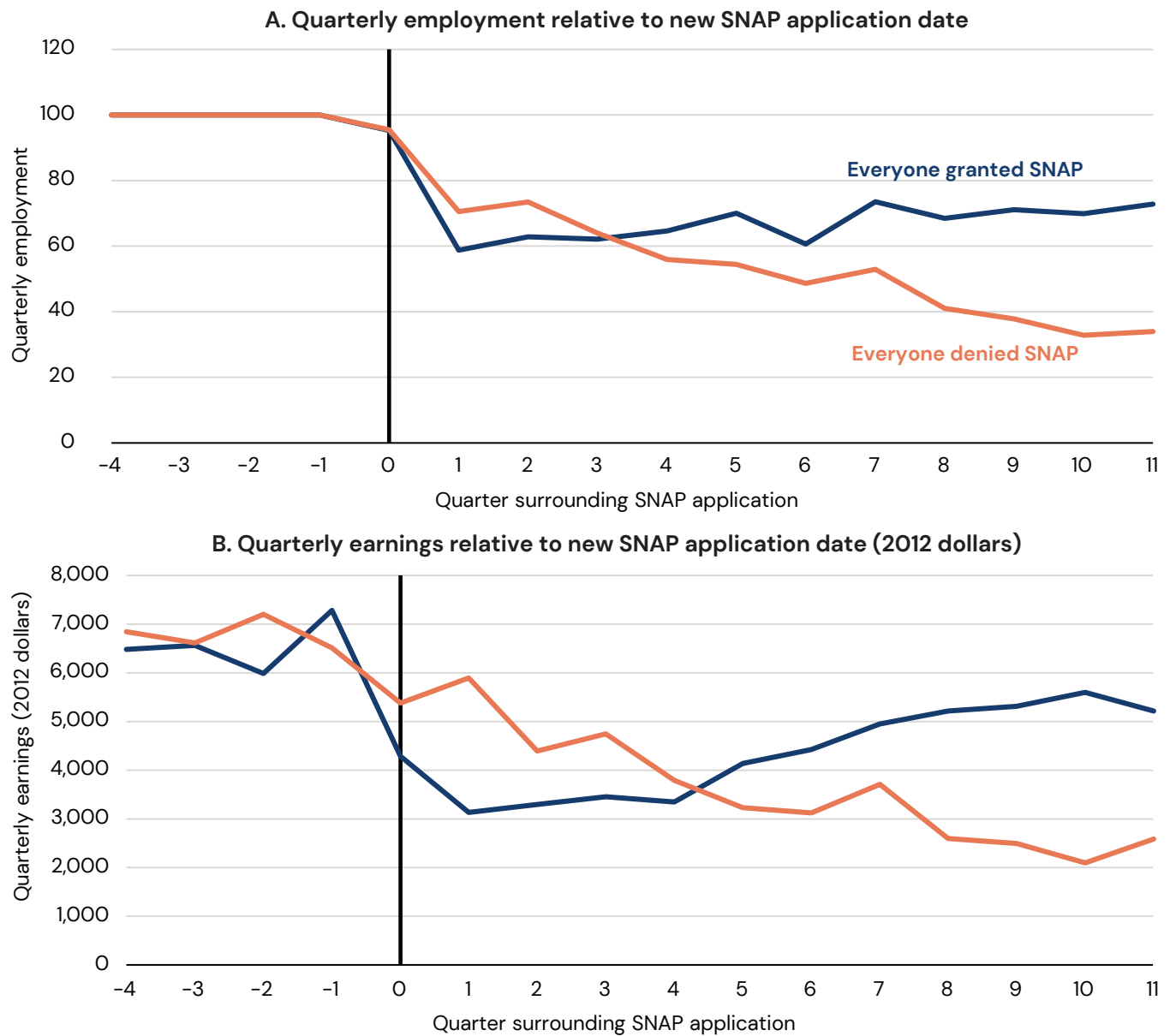
When people applied for SNAP, they were randomly assigned to caseworkers who helped them navigate the application process; caseworkers varied in their helpfulness and therefore whether an applicant ended up receiving benefits. The causal effect of SNAP on work-related outcomes was identified by comparing the outcomes of SNAP applicants who are identical, except that due to the random assignment of a caseworker, some received SNAP and some did not.

Digging in deeper into the main result, they find that this is partly driven by the fact that many working-age SNAP recipients face other barriers to work. For example, among SNAP recipients in 2019 who were aged 18–49, some 20 percent either had a disability themselves or lived with someone with a disability, and 29 percent had a preschool-aged child.

They further find that working-aged SNAP recipients who were able to work and who worked prior to

FIGURE 5

Effect of SNAP receipt on applicants' employment and earnings



Source: Cook and East 2023.

Note: The graphs show the employment and earnings outcomes expected if all new SNAP applicants were accepted onto SNAP (navy blue) or if all new SNAP applicants were denied SNAP (orange). The horizontal axis denotes time relative to SNAP application in quarters, where 0 is the quarter of SNAP application. Employment and earnings are measured quarterly.



applying for SNAP apply for SNAP when they [experience a hardship](#) such as a layoff, divorce, or childbirth. This population has a very limited ability to weather such a hardship using private savings—only 60 percent of working-aged SNAP recipients had a bank account before receiving SNAP and of those that did, the median amount saved was \$426 (calculated from the Survey of Income and Program Participation). Thus, SNAP provides important resources to help recipients get back on their feet.

From the Cook and East work, figure 5 shows work-related outcomes for SNAP applicants if they were accepted into SNAP (navy blue) and if those same people were instead denied SNAP (orange). Figure 5a then shows whether SNAP participation causes a change in employment, while figure 5b shows the effect on earnings.

Regardless of actual SNAP receipt, new applicants to SNAP exhibit a large decrease in employment and earnings right around the time of application. Additionally, if granted SNAP, recipients have slightly lower

earnings and employment right after the receipt of SNAP.

However, this decline in employment and earnings is very short-lived. The research finds that if all new applicants to SNAP were denied access to the program, employment and earnings would continue to fall in the years after SNAP application so that three years later, only 34 percent would be working, compared to 100 percent working before applying for SNAP. On the other hand, if these applicants are provided SNAP, they are more likely to work three years after, with an employment rate of 73 percent at that time.

What labor market conditions do SNAP recipients face?

[Research](#) shows that people who are likely to receive SNAP generally face a very different labor market than middle-class workers. SNAP recipients work low-wage jobs, and 29 percent remain below the poverty line even if they are working more than 30 hours per week for at least half the year (dubbed “substantial work” by the researchers).

The most common occupations among SNAP recipients have median annual earnings of only \$22,000 and an unemployment rate of 5.3 percent in 2017, compared to \$47,600 and 2.4 percent for middle-class occupations (2017 dollars). These common occupations among SNAP recipients have also seen no real wage growth in the past several decades and are much more likely to have job displacement than middle-class occupations. Moreover, common occupations among SNAP recipients generally do not put them on a ladder towards higher earnings and higher quality jobs in the future—among those working in occupations common among SNAP recipients, if workers have substantial work in one year, they are likely to have earnings that are lower the following year.

Most SNAP recipients who are able to work have at least some attachment to the labor market and evidently want to work, but because of the [types of jobs](#) they are able to get, their earnings are low and they face volatile labor markets with high rates of job turnover and unstable hours. In a previous Hamilton Project piece, we [show](#) that the lowest quintile workers, who are most likely to be eligible for SNAP, have the most unstable earnings and hours of work from week to week. Lower-income workers are also more likely to report that this instability is because of their employer’s request, not their own preferences. This makes it hard to secure and maintain the employment necessary to satisfy the rigid ABAWD work requirements and to eventually move up the job ladder.

How does a monthly 80-hour threshold for ABAWD work requirements affect workers?

Among SNAP recipients who are likely ABAWDs (aged 18–49 with no minor children and no receipt of disability benefits), about [half already work](#) during the month of SNAP receipt and three-quarters work within a year of SNAP receipt. Thus, looking only at very short-term snapshots of work overstates the amount of time SNAP recipients spend not working. The strict threshold of 80 hours per month does not account for the volatility present in the low-wage labor market.

Figure 6 shows instability in work hours among ABAWDs using the coefficient of variation (CV). Here, the CV indicates the dispersion of a person’s monthly work hours relative to their long-term average work hours, i.e., the ratio of the standard deviation in work hours to the mean of work hours. Monthly work hours are the number of average weekly work hours multiplied by the number of weeks that month. If someone works a 40-hour week every week of every month over the sample period, they will have a CV of 0 percent.

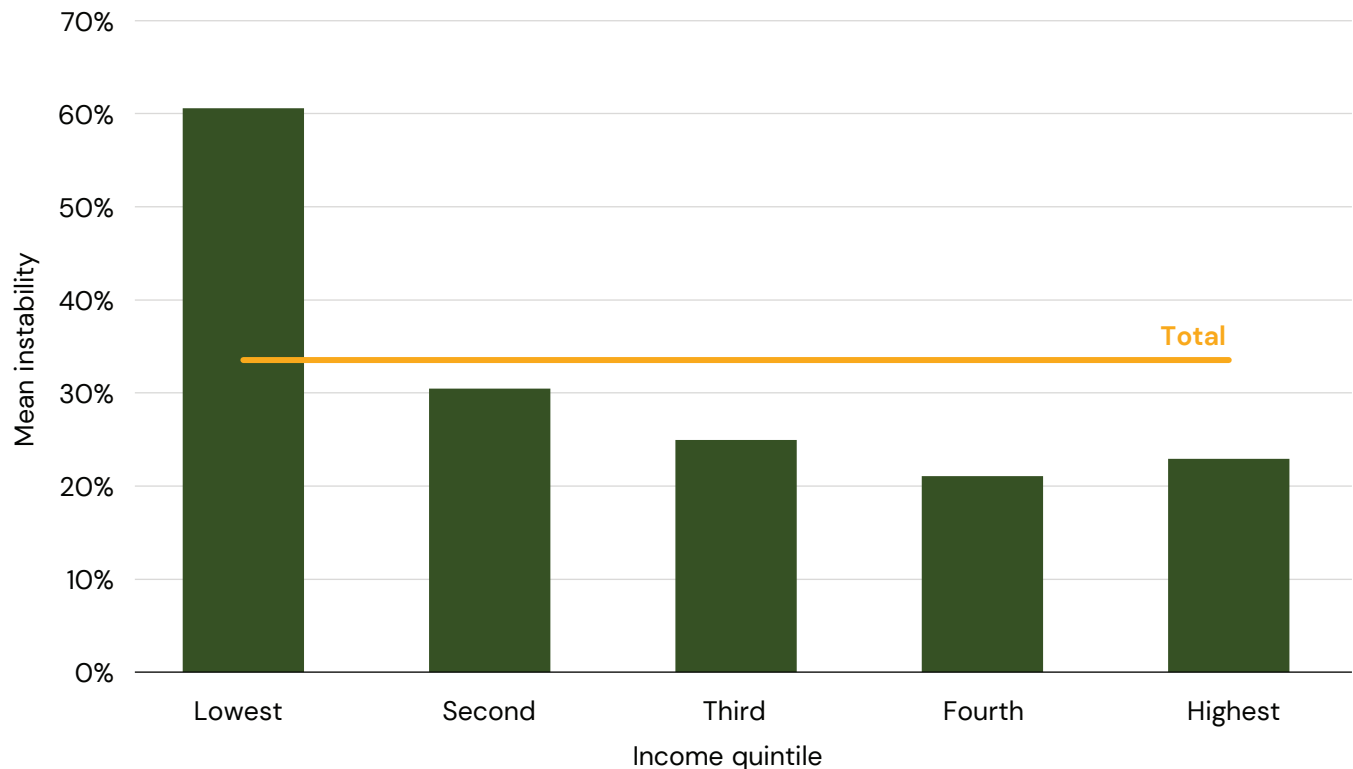
Figure 6 shows that while the average work hour instability among ABAWDs was a little less than 34 percent, it was 61 percent among the lowest-income households. Hours instability is so disproportionately high among the lowest-income households that average hours instability for the next 80 percent of households is below the average for the full population.

Additionally, [analysis](#) of the occupations in which SNAP recipients most often work reveals that work hours in these occupations are volatile and that this volatility is driven by the characteristics of these occupations, not by the characteristics of SNAP recipients. In 2017, occupations that SNAP recipients most commonly work in had an unemployment rate more than double the rate for occupations that paid above the median wage. Thus, many SNAP recipients may fail to meet the work requirement threshold due to the nature of the jobs they hold, not because they do not want to work more.

Furthermore, for The Hamilton Project, Lauren Bauer, Diane Whitmore Schanzenbach, and Jay Shambaugh [modeled](#) how ABAWD SNAP participants meet or do not meet the 20-hour threshold over a period of two years. They found that only 25 percent were labor force nonparticipants (meaning they did not work at all over the two-year period). Some 58 percent worked at least 20 hours a week for at least one month over the two years. Yet 25 percent worked more than 20 hours a week at some point but still fell below the 20-hour threshold for at least one month over the two-year period. This is evidence that the inflexible 80-hour per month threshold does not take into account volatility in the low-wage labor market.

FIGURE 6

Mean work hour instability (coefficient of variation) among able-bodied adults without dependents by personal income quintile, 2021–22



Source: Survey of Income and Program Participation 2022; Survey of Income and Program Participation 2023; authors' calculations.



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Notes: We restrict the sample to people who earned at least \$300 and worked at least 40 hours during at least one month of 2021, lived in household units with a consistent household structure and were present for all observed months. Income characteristics are based on data from the base year, 2021. Work hour instability is the coefficient of variation of monthly hours, the standard deviation of monthly hours over the mean of long-term hours (total hours for each month in 2021 and 2022), multiplied by 100. Hours are the average number of hours worked per week at all jobs held during the reference month multiplied by the number of weeks in the reference month. Able-bodied adults without dependents are individuals ages 18 to 64 who don't receive any income due to a disability—including veteran benefits or SSI/SSDI—and who are not parents to minor children in the household.

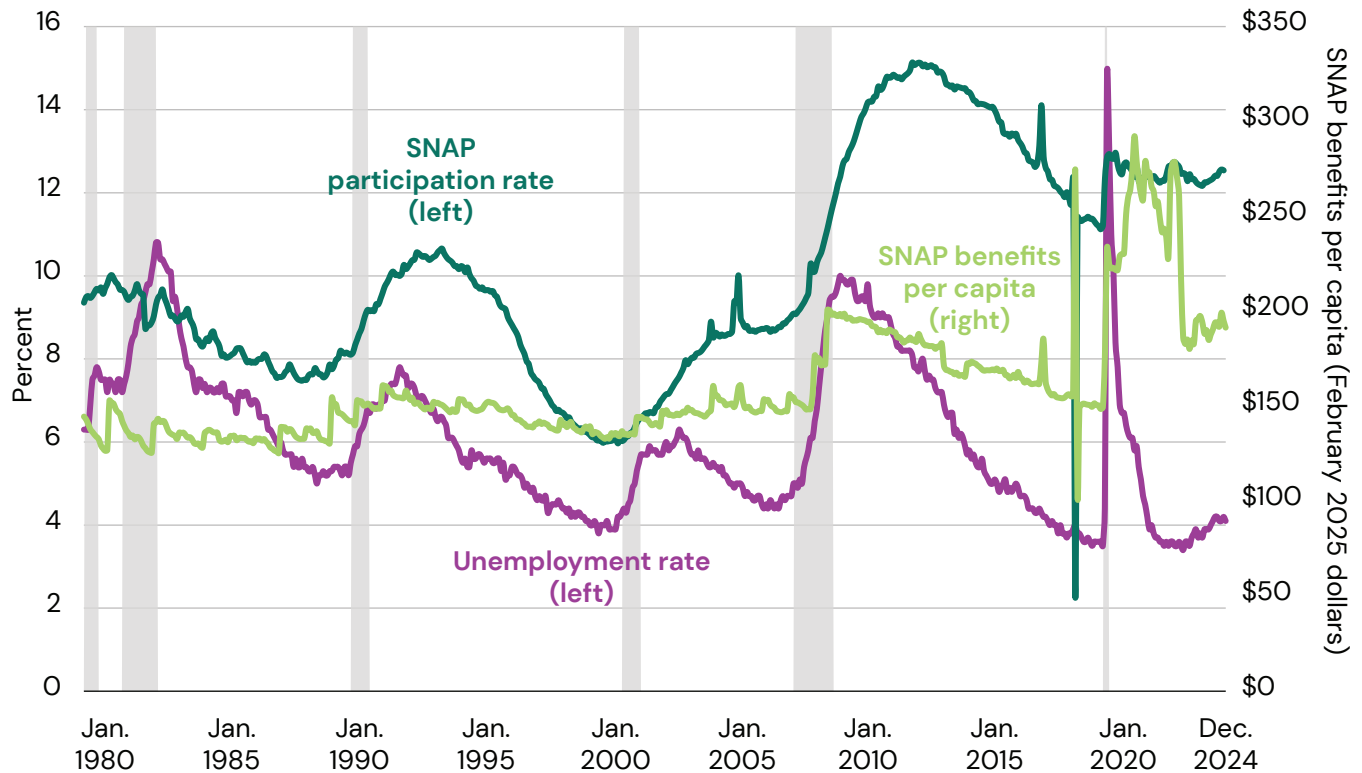
How do SNAP work requirements impede the economic recovery from a recession?

SNAP is a [key part](#) of the U.S. safety net, which on the whole is intended to provide income support and services to meet basic needs and to promote economic opportunity. Safety net programs for which participants are eligible due to their incomes—and which operate on an entitlement basis—are called “automatic stabilizers” because they [expand automatically](#) (without requiring new legislation) as the economy contracts and incomes fall. SNAP is one such automatic stabilizer. SNAP is uniquely positioned to respond to fluctuations in economic conditions and provide countercyclical stimulus because SNAP provides benefits to income-eligible families [regardless](#) of household structure and includes households with no other income.

Figure 7 shows the relationship between economic conditions, as measured by the unemployment rate on the left-hand-side axis, and SNAP receipt. We look at both SNAP participation—the percent of people receiving SNAP—on the left-hand-side axis—and the dollars of SNAP benefits received per capita on the right-hand-side axis. Since the recession in the early 1990s, SNAP has been responsive to economic conditions. Importantly, SNAP responds not only in the early days of the recession, but continues to provide benefits as the unemployment rate takes multiple years to recover. SNAP has been especially responsive in the last two recessions—the Great Recession and the COVID-19 recession—providing necessary aid to low-income households and economic stimulus to aid in the recovery. This responsiveness is in part due to waivers of work requirements implemented in the last two recessions, discussed below.

FIGURE 7

Unemployment, SNAP participation, and per capita SNAP benefits, 1980–December 2024



Source: USDA n.d.; BLS n.d.; authors' calculations.

Note: Shaded areas denote recessions. Per capita SNAP benefits are inflation-adjusted using the CPI-U to 2025 dollars. The large spike and sequential decline in SNAP benefits around January 2019 reflects the 35-day government shutdown, in which most of the February 2019 SNAP benefits were issued in January of 2019 in order for recipients to receive their benefits in a timely manner. Therefore, January 2019 benefits appear much higher than those of the previous months and February's benefits appear much lower.



SNAP provides localized economic stimulus because recipients make purchases at grocery stores and other qualified retailers and because participants spend the money quickly: On average, [97 percent](#) of SNAP benefits are spent within a month of receipt. As people spend their SNAP benefits, this helps maintain aggregate demand and stimulate the economy through retail, transportation, wholesale, and agriculture spending. This spending generates substantial economic activity: Past estimates suggest that during recessions, \$1 billion in SNAP benefits would translate to \$1.54 billion in GDP due to these multiplier effects.

Work requirements can [impede](#) SNAP's ability to provide a safety net to Americans during a recession and to help stimulate an economic recovery through food spending. If the ABAWD work requirements are in effect, they will impose time limits on SNAP benefit receipt among ABAWDs who are unemployed or underemployed because of economic conditions.

SNAP work requirements also make it harder for local economies with distressed labor markets to

recover if waivers are not in effect. Waivers are crucial to allow SNAP to stimulate and stabilize labor markets where there is evidence there are not sufficient jobs. This is especially true because low-income workers—who are more likely to be [eligible](#) for SNAP—are hit [particularly hard](#) during economic downturns and thus are likely to face challenges both to maintaining consumption and to finding new employment. A past Hamilton Project [policy proposal](#) by Hilary Hoynes and Diane Whitmore Schanzenbach called attention to this issue and suggested limiting or eliminating SNAP work requirements in order to maximize SNAP's capacity as economic stimulus.

Research evidence

SNAP is effective

To understand the effect of SNAP on households' food consumption, researchers often focus on identifying its effects on food insecurity. [Food insecure](#) households

are those who at times during the year are uncertain of having, or are unable to acquire, enough food to meet the needs of all their members because they have insufficient resources to purchase food. An estimated 13.5 percent of all U.S. households and 17.9 percent of households with children were food insecure [in 2023](#). Given that food insecurity typically increases when the economy contracts, it is notable that, overall, food insecurity rates did not rise during the pandemic. Most attribute this stability in food insecurity rates to the swift and sizeable policy response to the pandemic. [Research](#) has found that SNAP reduces food insecurity among participating households overall by one-fifth and among children by one-third.

Beyond improving food security, SNAP causes other positive health and economic outcomes. It improves the health of adults, making them less likely to visit the [doctor](#) multiple times in a year, thus reducing health care costs. Babies whose mothers have access to SNAP while in utero are 5–11 percent [less likely](#) to be born low birthweight, which is a signifier of poor infant health and is related to adverse health and economic outcomes in adulthood.

Critically, there are also longer-run benefits of SNAP participation. The best available evidence shows that among those who receive SNAP in early-childhood, SNAP causes [improved](#) outcomes across a variety of domains in later childhood and adulthood. This includes [improved](#) health, better [educational](#) and labor market [outcomes](#) including [earnings](#), and reduced likelihood of [criminal behavior](#). Given these long-run benefits, SNAP is a particularly cost-effective investment in young children, including positive effects on [academic performance](#), yielding benefits to recipients over time that far exceed the cost to the government for these [transfers](#).

There is also evidence that the purchasing power of SNAP benefits, at least before the Thrifty reform went into effect in 2021, was [inadequate](#). Research shows that SNAP benefits did not last the entire month, and many SNAP households went without food towards the end of the month after their SNAP benefits ran out. Among low-income high school students, taking the [SAT](#) around when they would receive SNAP led to better test scores and higher rates of college attendance compared to those who received SNAP several weeks before they took the test and thus were more likely to have run out of food at home.

SNAP is a work support

Those who advocate for work requirements argue that the threat of sanction will help counteract of the disincentives to work that result from receiving safety-net benefits. The theory is that SNAP makes participants reluctant to work, or to work more than they currently

do, because their benefits are reduced if their income increases.

This theory is not borne out in the real world. New rigorous [analysis](#), “The effect of means-tested transfers on work: Evidence from quasi-randomly assigned SNAP caseworkers” by Jason B. Cook and Chloe N. East, provides evidence that participation in SNAP does not reduce work effort.

Using administrative data, Cook and East show that among the majority of new working-age SNAP participants, participation in the program does not change employment or earnings compared to those who do not receive SNAP. This is true regardless of whether the SNAP participant is subject to any work requirements. Among the small subgroup that does change their work behavior in response to SNAP—those who worked in the year before applying for SNAP—they experience a small and temporary drop in earnings in the short-run and a large increase in earnings and employment in the longer-run.

Earlier research on the impact of SNAP on work found effects of SNAP on work ranging from zero to modest negative effects, but that research studied these effects for people receiving benefits [many decades ago](#) and for very specific and small subgroups of SNAP participants. For example, the most widely cited paper primarily focuses on the labor supply response among single mothers in the 1960–70s, but the labor force participation rate among single mothers has changed dramatically since then.

These are not today’s conditions, and so hinging [current analysis](#) on estimates from this period, when more-recent high quality causal evidence is available, is ill-advised. We recommend the use of estimates to predict labor supply impacts of SNAP based on the body of work in which the causal effects of SNAP participation and work requirement policy are identified for the contemporary SNAP population and low-wage labor market. These papers are explained in detail throughout this primer, and include:

- Bitler, Marianne, Jason Cook, and Jonathan Rothbaum. [2021](#). “Working for Bread: The Labor Supply of SNAP.” *AEA Papers and Proceedings* 111: 496–500.
- Cook, Jason B., and Chloe East. [2024](#). “The Disenrollment and Labor Supply Effects of SNAP Work Requirements.” Working Paper 32441, National Bureau of Economic Research, Cambridge, MA.
- Cook, Jason B., and Chloe East. [2024](#). “The Effect of Means-Tested Transfers on Work: Evidence from Quasi-Randomly Assigned SNAP Caseworkers.” Working Paper 31307, National Bureau of Economic Research, Cambridge, MA.
- Gray, Colin, Adam Leive, Elena Prager, Kelsey Pukelis, and Mary Zaki. [2023](#). “Employed in a SNAP? The Impact of Work Requirements on Program

Participation and Labor Supply.” *American Economic Journal: Economic Policy* 15 (1): 306–41.

- Stacy, Brian, Erik Scherpf, and Young Jo. 2018. “The Impact of SNAP Work Requirements.” Paper presented at the Society of Government Economists Annual Conference.
- Vericker, Tracy, Laura Wheaton, Kevin Bailer, and Joseph Gasper. 2023. “The Impact of ABAWD Time Limit Reinstatement on SNAP Participation and Employment.” *Journal of Nutrition Education and Behavior* 55 (4): 285–96.

Work requirements do not encourage work but do reduce program access

In theory, work requirements are included in SNAP to encourage participants to increase their work effort, because if they do not work, they will lose access to the program. Therefore, figuring out whether work requirements do—or do not—“work” is a fundamental question. This may seem straightforward to answer, but distinguishing the effect of work requirements from other reasons that SNAP participants change their work habits is quite difficult.

Researchers have undertaken two approaches to try to answer the question of whether ABAWD work requirements are effective in increasing labor force participation, as well as what their effects are on program participation. The best studies use administrative data to estimate the effects of ABAWD work requirements precisely by accurately measuring both changes in requirements and who is subject to them. Another set of studies model variation in these outcomes using less-precise publicly available data for (1) people who live in places with a waiver from the ABAWD work requirement and those who don’t live in such areas; and (2) people exposed to the work requirement who are just above or just below the upper age threshold for the requirement.

The papers that study the effect of ABAWD work requirements on labor market outcomes using high quality and precise administrative data consistently find large decreases in SNAP participation as a result of the work requirements, with [no change in employment](#).

The [research](#) that has best been able to identify the effect of ABAWD work requirements is “Employed in a SNAP? The impact of work requirements on program participation and labor supply” by Colin Gray, Adam Leive, Elena Prager, Kelsey Pukelis, and Mary Zaki. They isolate the effects of work requirements from other factors that affect an individual’s decision to work, by studying the imposition of these requirements on SNAP recipients just below age 50 and comparing their subsequent outcomes to the outcomes for people just above age 50, who were not subject to work requirements in this time period. They find that work requirements have no effect on work but

do reduce participation in SNAP by about 50 percent among the exposed population. This decline is due to decreased retention among current and new enrollees as well as deterrence of potential new enrollees. The authors argue this is because people subject to the work requirements face barriers to finding employment that satisfies the work requirements. We discuss how the characteristics of the low-wage labor market make it hard for ABAWDs to meet work requirements even when they are working or seeking work below.

Figure 8 summarizes evidence from this and two other studies that use administrative data to identify the causal effect of the ABAWD work requirement reinstatement on four outcomes: employment, hours worked if working, earnings, and SNAP participation. These studies show that there are no effects on employment or hours worked. Similarly, two of the studies find no effect on earnings, and one shows a reduction in earnings (the opposite of what is expected if work requirements encourage work). Finally, all of the studies estimate negative effects on SNAP participation, ranging from 15 to 54 percent for the exposed population, though one estimate is not statistically significant.

Additional studies model the effect of ABAWD work requirements using publicly available survey data.

These papers have more mixed findings on the impact of work requirements on employment—some papers find no effect on employment while others find small increases in [employment](#). However, in these papers that study SNAP participation, they find reductions in SNAP participation when work requirements are put in [place](#).

The literature on the two other components of SNAP work requirements is very limited. The first modern, quasi-experimental study of the general work requirement and E&T program was [recently released](#) by one of the authors of this piece. This paper uses high-quality administrative data on SNAP receipt and work as in the Gray et al. paper described above. The study takes advantage of the change in eligibility for these requirements when the youngest child in the household turns six and compares household outcomes for those whose youngest child turned six right before a SNAP eligibility recertification versus right after to identify causal effects. The findings indicate that general work requirements reduce SNAP participation because they open households up to being referred to a mandatory E&T program which causes them to stop receiving SNAP. Neither work requirement has any meaningful impacts on work behavior.

FIGURE 8

Causal estimates of the effect of ABAWD work requirement reinstatement on labor market outcomes and SNAP participation



Source: Gray et al. 2023; Vericker et al. 2023; Stacy, Scherpf, and Jo 2018; authors' calculations.

Note: Figure shows the point estimates and 95 percent confidence intervals (when available) from each paper. Employment, earnings, and SNAP receipt in Gray et al. 2023 is measured monthly. Employment, earnings, and SNAP receipt in Vericker et al. 2023 is measured quarterly. Employment, hours worked per week, and SNAP receipt is measured annually in Stacy, Scherpf, and Jo 2018.



Administrative burdens cause people beyond those who fail to work to be sanctioned by work requirements

The intended target of work requirements is people on SNAP who are able to work but aren't doing so and could be motivated to work by a work requirement. However, work requirements may affect [many groups](#) beyond that intended target. The extent of the collateral damage caused by work requirements stems from a combination of the federal rules of the road, paperwork burdens, and state-level decisions and implementation.

Indeed, for some proponents of work requirements, challenges in gaining and retaining access to SNAP are a feature and not a bug. Rule complexity, burdensome reporting requirements, bureaucratic gatekeeping, and confusing policy changes all serve to dissuade some of those who are eligible from participating in the program. We distinguish these effects into three types, following Pamela Herd and Don Moynihan's definition of [administrative burden](#).

Learning costs of work requirements

Work requirement rules and SNAP rules in general are complex. The process of learning about SNAP—how to apply, the work requirements and possible exemptions, and whether an individual might be eligible—can consume considerable time and resources. Eligible people can be excluded from SNAP simply because they do not understand the work requirement policy details. Examples of participants affected by this are:

- those who are unable to work but have not received a medically-sanctioned or other "good cause" exemption from work requirements;
- those who do not have stable housing or access to technology and thus have a hard time communicating with SNAP caseworkers;
- those who have limited literacy or face language barriers; and,
- those who are in fact meeting the work requirement standard but fail to understand the requirement and to provide the requisite documentation.

Compliance costs of work requirements

The basic SNAP application process is complex and time-consuming: There are complicated application forms, required interviews, and necessary documentation, which can include paystubs, bank statements, proof of rent/mortgage payments, utility bills, child care bills, and so forth.

On top of this, documenting compliance with the work requirements requires verification of additional things such as employment hours per week, a disability, or other exemption-eligible status. Examples of this verification include providing corroboration from their employer that includes pay per week and hours per week, which is especially challenging for self-employed and workers in non-traditional jobs, or, if they were recently unemployed, proof of employment ending.

Work requirement documentation thus substantially increases the time and effort necessary to complete the paperwork needed to prove eligibility for SNAP and compliance with SNAP rules. In addition, the rigid rules about what counts as work activity to satisfy the requirements make complying still more challenging, especially given the volatility in earnings and hours in the low-wage labor market. Examples of participants affected by this are:

- those who want to enroll in training programs but cannot find a spot in such a program (states are not required to provide individuals spots in these programs unless they are a mandatory E&T state);
- those who have a qualifying disability but fail to document it; and,
- ABAWDs who are working but not consistently above the 20-hours a week threshold.

Psychological costs of work requirements

As SNAP applicants have indicated, the process of applying for SNAP can be stigmatizing and patronizing. They [report](#) that caseworkers frequently talk down to them and ask questions that feel invasive about their personal lives and decisions. Work requirements add to these costs by restricting the choices that SNAP recipients can make about what types of jobs to take and how many hours to work, as well as by requiring additional intensive monitoring of SNAP recipients. Examples of groups affected by this are:

- those who view the reporting requirements as invasive and either for that reason or another reason do not provide the requisite documentation; and,
- those who become frustrated trying to figure out what documentation is necessary or how to secure it and whether they will be eligible—and are deterred from applying at all.

These administrative burdens have real effects on SNAP recipients and potential SNAP recipients, given the evidence discussed above that the imposition of work requirements substantially reduces participation in SNAP.

Implications of research findings for SNAP work requirement policies

[New research](#) using high quality administrative data shows that SNAP work requirements do not increase employment, but they do reduce program participation among low-income people who have few alternative sources of support besides SNAP. We believe that the evidence supports ending or severely limiting SNAP work requirements, as several Hamilton Project [policy proposals](#) by Hilary Hoynes and Diane Schanzenbach argue.

The decrease in SNAP receipt that results from work requirements is not trivial. Many SNAP recipients, especially those subject to the ABAWD work requirements, have little safety net to rely on besides SNAP. SNAP recipients have no meaningful savings, and those subject to the ABAWD requirements are adults without dependents, so they are ineligible for other short-term public social insurance programs such as TANF or the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC).

Evidence shows that if SNAP applicants are denied SNAP, they if anything have worse earnings and employment in the long run than if they are accepted, likely because they aren't able to weather harmful events without the safety net that SNAP provides. Moreover, ABAWDs who lose access to SNAP because of work requirements [accumulate more debt](#) on credit cards and are more likely to be late on their credit card payments, suggesting SNAP receipt positively affects the financial health of ABAWDs.

This does not mean SNAP cannot be employed to encourage working among low-income people. Existing features of SNAP could be expanded, and new incentives created to encourage work among those able to work and in areas where sufficient jobs exist. This includes expanding the deduction of labor earnings from SNAP income calculations, so that SNAP recipients aren't penalized for increasing work, and extending SNAP benefits to support people starting new jobs or re-entering the labor market by making job search an allowable activity. Lawmakers should consider alternative policies to work requirements that would increase work and support low-wage workers.

Going forward, we recommend that if work requirements remain in place, exemptions and documentation requirements be simplified and channels

for providing pertinent information be fortified. This could include maximizing the number of ways that an individual can prove exemption eligibility, choosing exemption categories that are relatively easy to document, and providing funding for states to better identify exempt participants. New categorical exemptions included in the FRA lend themselves to being pilots for developing better systems, such as using other agencies' (like Veterans Affairs) pre-existing databases that have the information required to automatically verify individuals' eligibility for exemptions.

With regard to SNAP work requirement waiver policies, the primary indicators that economists use to determine whether the economy is in a recession are real personal income (excluding transfers from the government) and nonfarm payroll employment. In other words, when labor market conditions show a reduction in employment and earnings, there is evidence that the economy is contracting. Nonetheless, there are always places within the U.S. where local labor markets are struggling. Typical ways to identify such areas are those places with high or relatively high levels of unemployment or people working part-time for economic reasons (PTER). When many people are seeking work but unable to find it, it is evidence that there are fewer jobs available than people who want employment. When many people are working part-time but would prefer to work more, it is evidence that there are not enough hours of work available to the employed. In addition, when the overall numbers indicate that there is weakness in the aggregate economy and labor market, it is always the case that conditions are worse in the low-wage labor market.

When there is evidence that there are not enough jobs and/or not enough full-time jobs, it is unfair to expect that SNAP participants who are subject to work requirements should be held to the rules. Therefore, there's a safety valve for work requirements when economic conditions warrant: waivers for places and congressional suspensions. When a waiver or suspension is in effect, all ABAWDs are exempt from work requirements.

In a world where ABAWD work requirements as described above are the law of the land, ensuring that work requirement waivers based on labor market conditions are implemented is the first best policy solution. Waivers and suspensions ensure that eligible participants are not unduly punished for circumstances beyond their control. And such waivers are also instrumental to an economic recovery, as SNAP participants spend money quickly and locally, stimulating the economy.

Congress has suspended work requirements nationwide by hand in the past two recessions. Consistent with proposals for other countercyclical social insurance programs, The Hamilton Project has a [policy proposal](#) that offers ideas for how to automatically

suspend work requirements when economic conditions warrant. Because requesting place-based waivers is optional for states, there are labor markets that would qualify for suspension where ABAWDs are nevertheless subject to work requirements and their consequences. For horizontal equity, policymakers should consider letting USDA track and exempt places based on the rules in law and regulation.

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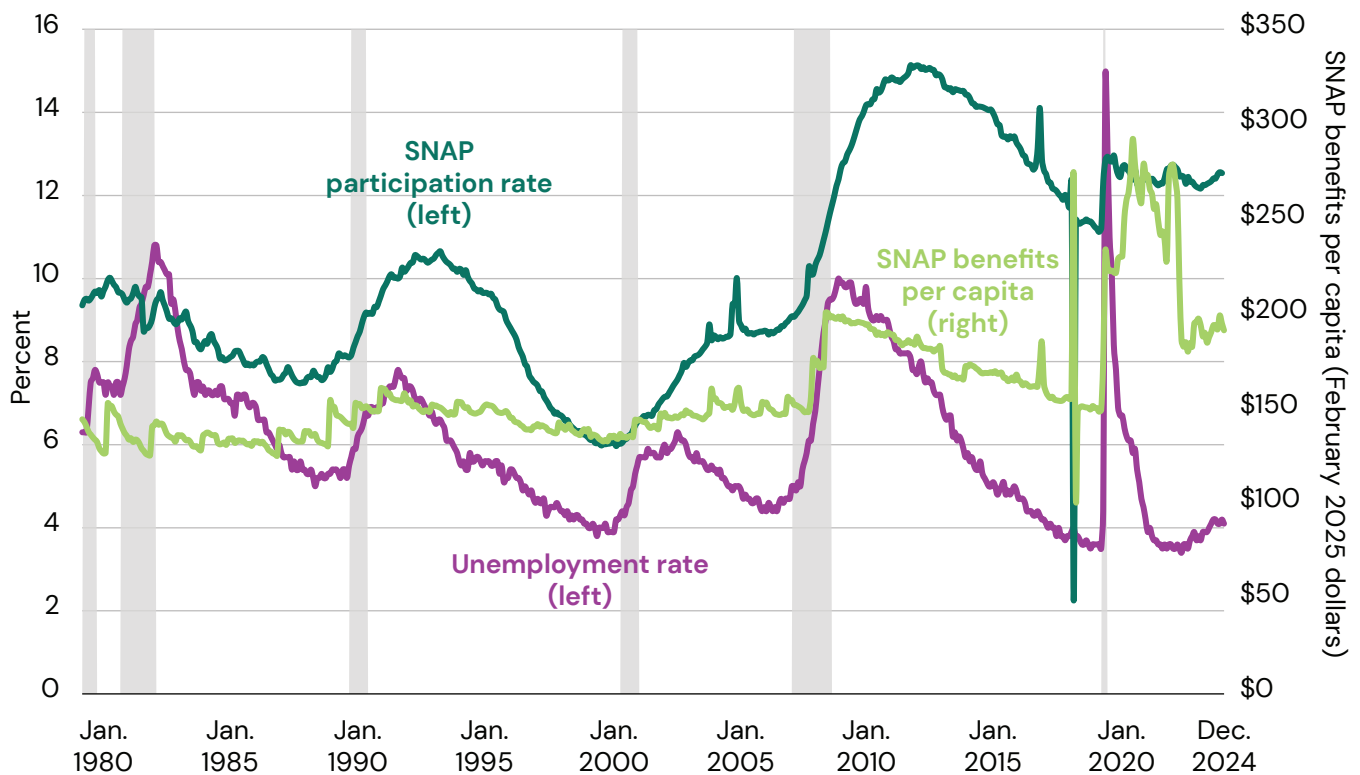
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The Supplemental Nutrition Assistance Program (SNAP; formerly known as the Food Stamp Program) is a crucial part of the safety net in the United States, providing benefits to roughly 42 million Americans per month to maintain a nutritious diet. In 1996, work requirements in SNAP expanded, limiting the efficacy of the program to support all low-income households. In this primer, we answer frequently asked questions about SNAP work requirements, summarize rigorous research evidence, and offer key takeaways to help guide an understanding of work requirement policy, the people subject to work requirements, and features of the labor market in which these SNAP participants work. We conclude that the evidence supports largely or fully eliminating able-bodied adult without dependents (ABAWD) work requirements.

Unemployment, SNAP participation, and per capita SNAP benefits, 1980–December 2024



Source: USDA n.d.; BLS n.d.; authors' calculations.

Note: Shaded areas denote recessions. Per capita SNAP benefits are inflation-adjusted using the CPI-U to 2025 dollars. The large spike and sequential decline in SNAP benefits around January 2019 reflects the 35-day government shutdown, in which most of the February 2019 SNAP benefits were issued in January of 2019 in order for recipients to receive their benefits in a timely manner. Therefore, January 2019 benefits appear much higher than those of the previous months and February's benefits appear much lower.

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