

Human Services Work Requirement Crosswalk as Impacted by the One Big Beautiful Bill Act (OBBBA/H.R. 1)



The following chart summarizes the Supplemental Nutrition Assistance Program (SNAP) work requirements, Able Bodied Adult Without Dependents (ABAWD) work requirements, the newly established community engagement requirements in Medicaid, the SNAP Employment & Training (SNAP E&T) program requirements, and the Temporary Assistance for Needy Families (TANF) Work Participation Rate (WPR) requirements based on the passage of the One Big Beautiful Bill Act (OBBBA/H.R.1).

SNAP ABAWD requirements were significantly altered and new Medicaid community engagement requirements were established by the passage of OBBBA/H.R. 1. Our interpretation of these changes is included in the table below. On October 3, the USDA Food and Nutrition Service (FNS) released its first pieces of guidance on implementing the changes to SNAP Work Requirements (hyperlink: <https://www.fns.usda.gov/obbb>). We expect guidance from the Centers for Medicare & Medicaid Services in 2026. If you have any questions or would like to discuss more, please reach out to Chloe Green, Assistant Director, Policy at cgreen@aphsa.org.

TABLE OF CONTENTS

How does OBBBA/H.R. 1 affect requirements?	2
What is the effective date?	2
Can requirements be waived?	2
What is the age range?	2
Who is exempt or excused (good cause)?	3
How do short-term hardships affect work requirements?	3
What certification periods are allowed for these individuals?	4
When is the timeframe for compliance oversight with work requirements?	4
How does an individual meet the requirements?	5

What are the verification requirements?	6
What are the notice requirements?	6
What happens if a participant fails to comply with work requirements?	7
What are the notice requirements around denial or discontinuation of benefits?	8
How does a request for a fair hearing impact the case?	8
How are other household members impacted?	8
How does an individual regain eligibility?	9

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	SNAP General Work Requirements	SNAP ABAWD Work Requirements	Medicaid Work Requirements	SNAP Employment & Training	TANF WPR Requirements
How does OBBBA/H.R. 1 affect requirements?	No changes to existing statute.	Modifies age range, who is exempt, and how a state or local area can qualify for waivers.	Establishes new community engagement/work requirement provisions for certain adults.	No changes to existing statute.	No changes to existing statute.
What is the effective date?	N/A	July 4, 2025	January 1, 2027; earlier if a state opts in by amending state plan or receives a 1115 waiver to do so (note that we are still awaiting CMS guidance to understand what would be sufficient to receive this waiver).	N/A	N/A
Can requirements be waived?	No	Yes, at state request, if state or local area has unemployment rate over 10 percent (note that waivers were previously also permitted with justification of insufficient jobs). There is also a special waiver authority for Alaska and Hawai'i through 2028.	If the state substantiates good faith effort to implement the provision, they may request an exemption up to December 31, 2028. However, it is not yet clear how likely it is that waivers will be granted.	No waiver necessary, but states have broad authority on exemptions (see below). State agencies gain approval through the annual state E&T Plan.	A state's WPR requirement can be reduced by several methods. The two most common include excess state Maintenance-of-Effort (MOE) spending or reduction of the state TANF caseload thereby receiving Caseload Reduction Credit (CRC). The individual requirement is monitored at the state level.
What is the age range?	Ages 16-59	Ages 18-64	Ages 19-64	Generally, the same age range as General SNAP Work Requirements.	Generally, parents or adult caretakers receiving TANF cash assistance above 18, or minor parents who are heads of household.

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Who is exempt or excused (good cause)?	<p>Already working at least 30 hours a week (or earning wages at least equal to the federal minimum wage multiplied by 30 hours).</p> <p>Meeting work requirements for another program (TANF or unemployment compensation).</p> <p>Taking care of a child under six or an incapacitated person.</p> <p>Unable to work due to a physical or mental limitation.</p> <p>Participating regularly in an alcohol or drug treatment program.</p> <p>Going to school, college, or a training program at least half-time.</p> <p>Regulations also stipulate specific criteria for "suitable employment" and good cause for voluntarily quitting/leaving employment or resigning from a job that is unsuitable. This includes discrimination, unreasonable work demands, or being physically or mentally unfit to perform duties.</p>	<p>Medically certified or physically or mentally unfit for employment.</p> <p>A parent or other member of a household with responsibility for a dependent child under 14 years of age.</p> <p>A pregnant woman.</p> <p>Exempt from the General Work Requirements for reasons other than age.</p> <p>Living in an area where the ABAWD Time Limit is waived.</p> <p>Indian or an Urban Indian.</p> <p>California Indian.</p>	<p>A pregnant woman.</p> <p>A person under 19 or over 64.</p> <p>A former foster youth under 26.</p> <p>Indians, Urban Indians, and California Indians.</p> <p>Veterans with rated disabilities.</p> <p>Medically frail individuals.</p> <p>People participating in a substance use or alcohol use disorder treatment program.</p> <p>People who are compliant with TANF/SNAP work requirements.</p> <p>People who are parents or caregivers of a dependent child 13 years of age and under or someone with a disability.</p> <p>People who are currently incarcerated or have been released within the past 90 days.</p> <p>Family caregiver as defined in RAISE Family Caregivers Act.</p> <p>Individuals enrolled in or entitled to Medicare Part A or B coverage.</p> <p>Individuals entitled to certain categories of postpartum medical assistance.</p>	<p>States have broad authority to exempt work registrants from the requirement to participate in E&T. Exemptions can include:</p> <p>For Voluntary Programs:</p> <ul style="list-style-type: none"> All work registrants <p>For Mandatory Programs:</p> <p>Generally follow the same exemptions as the General Work Requirement, with additional optional exemptions, including:</p> <ul style="list-style-type: none"> Geographic location Pregnancy Homelessness Low English Proficiency <p>In addition, states must exempt individuals if there are:</p> <ul style="list-style-type: none"> Lack of appropriate available slots in E&T All individuals whose participant reimbursement exceeds what the state agency will reimburse 	<p>At the federal level, minor parents who are not heads-of-household, non-recipient parents, recipients under age 18, unless they are heads-of-household.</p> <p>States can also create additional exemptions at their discretion. Above these federal regulations, exemptions are at state discretion. This commonly includes those who are ill or incapacitated, caring for someone who is incapacitated, or above a certain age. Some states also exempt pregnant women or people with infants.</p>
How do short-term hardships affect work requirements?	<p>State agencies are required to take into account good cause for not meeting work requirements including, but not limited to, circumstances beyond the individual's control, such as illness or lack of adequate child care. State agencies determine if individuals have good cause for failing to meet these work requirements.</p>	<p>State agencies must grant good cause for temporary circumstances, such that an individual would have otherwise fulfilled the requirement. Good cause shall include circumstances beyond the individual's control, such as, but not limited to, illness, illness of another household member requiring the presence of the individual, a household emergency or unavailability of transportation.</p>	<p>State agencies can deem an individual to have met community eligibility requirements under the following circumstances:</p> <ul style="list-style-type: none"> Inpatient hospital services, including nursing home or psychiatric placement individual resides in an area declared a disaster under the National Emergency Act or Stafford Act Individuals have to travel outside the area to receive medical services for a serious or complex condition Individual resides in an area where the unemployment rate is at or above the lesser of 8% or 1.5 times the national unemployment rate 	<p>See general work requirements.</p> <p>Good cause includes circumstances where the state agency determines that there is not an appropriate available opening within the E&T program for the participant, available for as long as there is a lack of an appropriate slot.</p>	<p>At state discretion.</p>

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What certification periods are allowed for these individuals?	Same as general SNAP population (up to 12 month certifications).	Same as general SNAP population (up to 12 month certs for those under 60, however 4 month certs are recommended by FNS for ABAWDs).	Same as general Medicaid expansion population (every 6 months).	Same as general SNAP population.	At state discretion within the federally required 60-month time limit.
When is the timeframe for compliance oversight with work requirements?	<p>Condition of eligibility—screening part of certification and redetermination.</p> <p>Ongoing throughout receipt of benefits in accordance with reporting requirements.</p>	<p>Not a condition of eligibility, however, a state agency should screen for exemptions as part of the certification/recertification process.</p> <p>Individual must follow requirements on the first day of the first full month after the state agency determines that the individual is not exempt from the requirements.</p> <p>Ongoing throughout receipt of benefits, in accordance with reporting requirements.</p> <p>Participant is allowed three countable months of non-compliance in a 36-month period before subject to termination of benefits.</p> <p>The state agency must track countable months within the 36-month period and apply the time limit accordingly. Note that state agency must track countable months even if there are breaks in a person's time-limit status or participation in SNAP.</p> <p>State has discretionary exemptions that may be applied to some individuals.</p>	<p>Condition of eligibility—at application, state agencies must look at the month prior to determine if work requirement has been met during that period. States may also opt to require individuals to have met the work requirement for as many as three consecutive months immediately prior to application. Seasonal workers allowed an average monthly income that is not less than the applicable minimum age requirement over a 6-month period. At renewal, it must be during at least one month of the previous 6-month eligibility period (but does not have to be the immediately preceding month).</p> <p>At a state agency option, verification can occur more frequently.</p>	<p>States are required to screen all work registrants not otherwise exempted by the state agency as part of the certification process. Screening by an eligibility worker must include the following:</p> <ul style="list-style-type: none"> • Conduct assessment of skills to determine appropriate placement and identify barriers to participation • Screen for the need for supportive services (transportation, child care, accommodations) • Make a referral if appropriate 	Generally two years.



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How does an individual meet the requirements?	<p>Register for work.</p> <p>Accept an offer of suitable employment.</p> <p>Not voluntarily quit or reduce hours of employment below 30 hours per week without good cause.</p> <p>Participate in workfare or SNAP E&T if required by the state agency.</p>	<p>Work at least 80 hours a month. Work can be for pay, for goods or services (for something other than money), unpaid, or as a volunteer.</p> <p>Participate in a work program at least 80 hours a month. A work program could be SNAP E&T or another federal, state, or local work program.</p> <p>Participate in a combination of work and work program hours for a total of at least 80 hours a month.</p> <p>Participate in workfare for the number of hours assigned to you each month (the number of hours will depend on the amount of your SNAP benefit).</p>	<p>The following criteria were listed in the legislation, but subject to regulation:</p> <ul style="list-style-type: none"> Works not less than 80 hours/month Completes not less than 80 hours/month of community service Participates in a work program 80 hours/month Any combination of the above totally not less than 80 hours/month Individual is enrolled in an education program at least half time Individual has an income above the federal minimum wage times 80 hours, or \$580/month For seasonal workers, average monthly income above the federal minimum wage times 80 hours, or \$580 over previous 6 month period 	<p>States have flexibility in how they design their program. It is required that states must operate a program that consists of case management and at least one or more components. Components are approved as part of the state plan and can include:</p> <ul style="list-style-type: none"> Supervised job search with restrictions on length of participation Job search training Workfare Work experience, including on the job training or vocational training Educational programs, skills training, or other programs that improve participant employability Job retention services <p>Participants comply by participating in one or more components as directed by the state agency.</p>	<p>In general, the individual compliance requirement varies by states based on their WPR and qualified reductions. If a state does not have a significantly reduced WPR, 50% of all families and 90% of two-parent families must meet work requirements.</p> <p>Federal regulations set the following minimum weekly work requirements:</p> <ul style="list-style-type: none"> For single parents/caretaker relatives: 30 hours/wk, 20 of which are required core activities For single parents with a child under 6: 20 hours/wk, 20 of which are required core activities For two-parent families: 35 hours/wk, 30 of which are required core activities For two-parent families (with TANF-funded child care): 55 hours/wk, 50 of which are required core activities <p>Core activities include:</p> <ul style="list-style-type: none"> Unsubsidized or subsidized employment Work experience On-the-job training Job search and job readiness assistance (limited duration) Community service Vocational educational training (limited to 12 months) Caring for a child of a recipient in community service <p>Non-core activities include:</p> <ul style="list-style-type: none"> Education directly related to employment Job skills training Secondary school attendance (for those without a diploma)



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What are the verification requirements?	<p>State agency is not required to verify an exemption or exception unless it determines the information is questionable or verification is otherwise required by program rules, for example, disability status.</p> <p>Good cause—state agency must request verification of individual's statements to the extent that the information is questionable. The individual has primary responsibility for providing verification.</p> <p>Registered for work or E&T/workfare referral verified.</p> <p>Enrollment confirmation; training or work assignment letters.</p>	<p>Exceptions as defined in the Act are verified only if questionable. State agencies are generally not required to verify unless information is otherwise required by program rules or questionable.</p> <p>However, verification rules require mandatory verification for ABAWDs as follows:</p> <ul style="list-style-type: none"> Hours worked: for individuals satisfying the requirement by working or combining work and participation in a work program or participating in a work or workfare program not operated or supervised by the state agency Countable months in another state if there is an indication that the individual participated in that state 	<p>The following verification requirements were listed in the legislation but subject to regulation:</p> <ul style="list-style-type: none"> The state shall establish processes and use reliable information available to the state such as payroll data or payments or encounter data under this title for individuals and data on payments to such individuals for the provision of services covered under this title without requiring where possible the applicable individual to submit additional information The state agency shall implement Ex Parte verification procedures to the extent possible 	<p>States must screen all work registrants not otherwise exempt during the SNAP certification process. Generally, states are required to track and verify participation in E&T components including attendance records, hours of participation and completion of activities and must describe in their state plans how they plan to address how they will monitor and track these.</p>	<p>Almost all work activities must be supervised on an ongoing basis; at least once per day the individual is scheduled to participate. States must maintain accurate documentation of the type of activity, number of hours participated, supervision and verification of participation, and any exemptions or good cause determinations. State agencies must submit a work verification plan that outlines how states verify work for participants.</p>
What are the notice requirements?	<p>State agencies must provide households with a consolidated written notice and an oral explanation of all applicable work requirements, including the general work requirements, ABAWD requirements, and mandatory SNAP E&T, if assigned.</p> <p>The state agency must provide this consolidated written notice and oral explanation at certification, recertification, and whenever a previously exempt household member or new household member becomes subject to work requirements.</p> <p>Notice of Adverse Action requirements also apply. See below.</p>	<p>Same as SNAP general work requirements.</p>	<p>Notice of community engagement provision implementation prior to December 31, 2026 or at least three months prior to the go-live date and periodically as part of certification and recertification process thereafter, though this will be subject to regulation.</p> <p>Notice required in writing and one additional form, including telephone, text message, website, or other available electronic means.</p>	<p>Same as the SNAP general work requirements.</p>	<p>States must conduct an initial assessment of each recipient who is at least 18 years old, or has not completed high school and is not attending secondary school. States may develop an Individual Responsibility Plan (RP) that, if used, acts as a formal notice of what is expected from the recipient and what supports may be provided.</p>

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<p>What happens if a participant fails to comply with work requirements?</p>	<p>State agency must impose a disqualification in the instance of non-compliance, as follows:</p> <ul style="list-style-type: none"> At the first occurrence of non-compliance, state agency can choose a period of disqualification 1-3 months; At the second occurrence of non-compliance, state agency can choose a period of disqualification 2-6 months; At the third occurrence of non-compliance, state agency can choose a period of 6 months or permanent disqualification. 	<p>The state agency must apply the time limit to time-limited participants that use all three countable months in a 36-month period.</p>	<p>The following procedures were listed in the legislation but are subject to regulation:</p> <p>If a state is unable to verify that an applicable individual has met the requirement to demonstrate community engagement and is not exempt, the state shall provide such individual with the notice of noncompliance, provide such individual with a period of 30 calendar days, beginning on the date on which such notice of noncompliance is received by the individual, to make a satisfactory showing to the state of compliance with such requirement (including, if applicable, by showing that such individual was or should be deemed to have demonstrated community engagement or make a satisfactory showing to the state that such requirement does not apply to such individual on the basis that such individual does not meet the definition of applicable individual).</p> <p>If an ongoing recipient covered by Medicaid, the state agency must also continue to provide medical assistance during the 30 day calendar period.</p> <p>If individual does not provide satisfactory showing, state agency will deny such individual's application for medical assistance not later than the end of the month following the month in which such 30-calendar-day period ends.</p>	<p>States may designate SNAP E&T participation as mandatory for certain work registrants. If a mandatory participant fails to comply, the state's designated disqualification rules apply. Voluntary participants are not subject to disqualification for noncompliance. Before imposing a sanction, the state must determine whether the individual had good cause for noncompliance. Generally, nonexempt individuals who refuse or fail to comply without good cause to mandatory SNAP E&T requirements (as part of the SNAP work requirement) may be disqualified from SNAP.</p>	<p>The state must sanction a TANF household if they refuse to participate in work activities and are not exempt. The sanction is determined by the state and can involve reducing or removing benefits from an individual or household.</p>



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What are the notice requirements around denial or discontinuation of benefits?	<p>The state agency must send a formal Notice of Adverse Action (NOAA) to the recipient before suspending, reducing, or terminating benefits due to noncompliance with work requirements.</p> <p>The NOAA must include:</p> <ul style="list-style-type: none"> • The action being taken (e.g., benefit suspension or reduction) • The reason for the action • The specific regulation or policy being applied • The effective date of the change • The household's right to request a fair hearing • The deadline for requesting a hearing to continue benefits during the appeal • How to regain compliance, if applicable <p>Timing of the NOAA:</p> <ul style="list-style-type: none"> • At least 10 days before the action takes effect (known as "advance notice" or "timely notice") 	<p>Same as general work requirements.</p> <p>Note that the state agency must send the NOAA and prepare to terminate benefits for the time-limited participant before the end of their third countable month. If the tracking system indicates that a person is in their third countable month, the state agency proceeds to send the NOAA at least 10 days before the end of the month and prepares to terminate benefits for the time-limited participant before it issues the next month's benefit allotment.</p>	<p>The following procedures were listed in the legislation but are subject to regulation:</p> <p>The individual must be provided written notice and granted an opportunity for a fair hearing prior to discontinuation of benefits.</p> <p>The notice of noncompliance shall include information how such individual may make a satisfactory showing of compliance with such requirement or make a satisfactory showing that such requirement does not apply to such individual on the basis that such individual does not meet the definition of applicable individual and how such individual may reapply for Medicaid.</p>	<p>Same as general work requirements.</p> <p>Note that state agencies may offer a conciliation process as part of its E&T program. In this case, NOAA would be offered no later than the end of conciliation period if necessary.</p>	<p>Every applicant or recipient shall be informed in writing at the time of application and at the time of any action affecting their claim. Notice is mailed at least 10 days before the date of action which is the date upon which the action would become effective.</p>
How does a request for a fair hearing impact the case?	<p>If a recipient requests a fair hearing within that 10-day window, benefits must continue unchanged until the hearing decision is issued, subject to certification periods.</p>	<p>Same as general work requirements.</p>	<p>Unclear, awaiting guidance.</p>	<p>Same as general work requirements.</p>	<p>If a recipient requests a fair hearing within that 10-day window, benefits must continue unchanged until the hearing decision is issued unless it meets one of the outlined exceptions.</p>
How are other household members impacted?	<p>State agency option to disqualify entire household if head of household is disqualified.</p>	<p>Can impact benefit level for the household.</p>	<p>No impact because Medicaid eligibility is determined at the individual level.</p>	<p>Same as general work requirements.</p>	<p>If an individual fails without good cause to comply with an individual responsibility plan that the individual signed, the state may reduce the amount of assistance otherwise payable to the family by whatever amount it considers appropriate.</p>

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How does an individual regain eligibility?	<p>Subject to the disqualification periods imposed by the state agency and compliance with work requirements, participation may resume if individual applies again and is determined by the state agency to be in compliance with work requirements.</p> <p>Individual can also regain participation during the disqualification period if they are eligible for an exemption.</p>	<p>Individuals can reapply at any time. A change in circumstances may make them exempt and therefore eligible. An individual that has used all three countable months of benefits in a 36-month period can also regain eligibility by meeting the ABAWD Work Requirements over 30 consecutive days.</p> <p>An individual that regains eligibility by meeting the 80-hour requirement is eligible for an additional three month eligibility, starting on the date the individual first notifies the state agency that the individual is no longer meeting the requirement. Additional three months only provided once in a 36-month period.</p>	<p>Not explicitly in statute, but it appears this would be addressed in June 2026 regulation as follows:</p> <p>An individual can reapply at any time. A change in circumstances may make them exempt and therefore eligible. Alternatively, they must meet the work requirements for the 30-day period prior to application in order to satisfy this condition of eligibility.</p>	<p>Same as general work requirements.</p>	<p>An individual may reapply for benefits as long as they have not exceeded total time limit on TANF benefits.</p>

