Many SNAP Participants Are Not Confident They Can Meet Work Requirements

Changes to SNAP May Further Reduce Program Participation

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The One Big Beautiful Bill Act (OBBBA), passed by Congress in July 2025, made the largest federal funding cut to the Supplemental Nutrition Assistance Program (SNAP) in the program's history. In addition to changing how the program is financed, the OBBBA expanded work requirements that previously applied to a group known as able-bodied adults without dependents (ABAWDs) composed of adults ages 18–54 who do not live with children.[1] The OBBBA extended these requirements to adults ages 55–64 and adults with children if all of their children are ages 14 or older. The legislation also removed some prior automatic exemptions for individuals who are veterans, experiencing homelessness, or youth aging out of foster care, added an exemption for adults who are American Indian or Alaska Native, and sharply curtailed states' ability to waive the work requirements in areas with limited job opportunities.

Adults who do not qualify for an exemption because of health limitations and cannot consistently document that they meet the requirement to work or engage in similar activities (such as a work training program) 80 hours each month are subject to a benefit time limit, in which they cannot receive more than three months of SNAP benefits over three years. The Congressional Budget Office estimates that these work requirement changes will reduce SNAP participation by about 2.4 million people by 2034 (CBO 2025). Substantial evidence shows that work requirements do not meaningfully encourage work or increase employment, but they do reduce SNAP participation substantially (Bauer and East 2026; Wheaton et al. 2021). Further, work requirements are labor intensive to administer and increase the burden on both applicants and state SNAP administrators.

In this brief, we use December 2025 data from the Urban Institute's Well-Being and Basic Needs Survey (WBNS) to explore the characteristics of adults ages 18–64 who reported receiving a notice about the ABAWD SNAP work requirement in the year before the survey, whether those who received a notice applied for an exemption, and whether those without an approved exemption are confident in their ability to meet the work requirement. Our findings reflect experiences of those who reported receiving notices in the 12 months before the survey and their perceived difficulty in meeting these requirements. This analysis can inform efforts to monitor SNAP participation trends during 2026, as more SNAP participants may exit the program due to challenges with meeting work requirements or navigating the paperwork associated with documenting compliance or an exemption.

Key Findings

Nearly 1 in 5 Working-Age Adults Currently Participating in SNAP Reported Their Families Received a Work Requirement Notice in the Last Year

The December 2025 survey asked respondents whose families participated in SNAP in the last year if they or a family member had ever received a notice from their SNAP agency that they had to work or participate in a work

program for 80 hours per month to receive SNAP. Additional questions asked who in the family received the notice and the last time such a notice was received. In this analysis, we focus on those who reported receiving a notice in the last 12 months.

Among all adults ages 18–64 who indicated their family was still receiving SNAP at the time of the December 2025 survey, nearly 1 in 5 (18.2 percent) reported they or a family member received a notice in the last 12 months (table 1). This includes 13.4 percent who reported they personally received a notice about the work requirement within the last 12 months and 6.4 percent who reported another family member received the notice (1.6 percent reported both they and a family member received a notice); 12.6 percent did not know whether they or a family member ever received a notice or when it was received.

TABLE 1

Receipt of a Work Requirement Notice in the Last 12 Months Among Adults Ages 18–64 Whose Families Participated in SNAP at the Time of the Survey, December 2025

Survey item	Percentage (%)
Respondent or a family member received a notice about the SNAP work requirement in the last 12 months	
Yes	18.2%
No	68.9%
Don't know	12.6%
Who received the notice	
Respondent	13.4%
Other family member	6.4%

Source: Well-Being and Basic Needs Survey, December 2025.

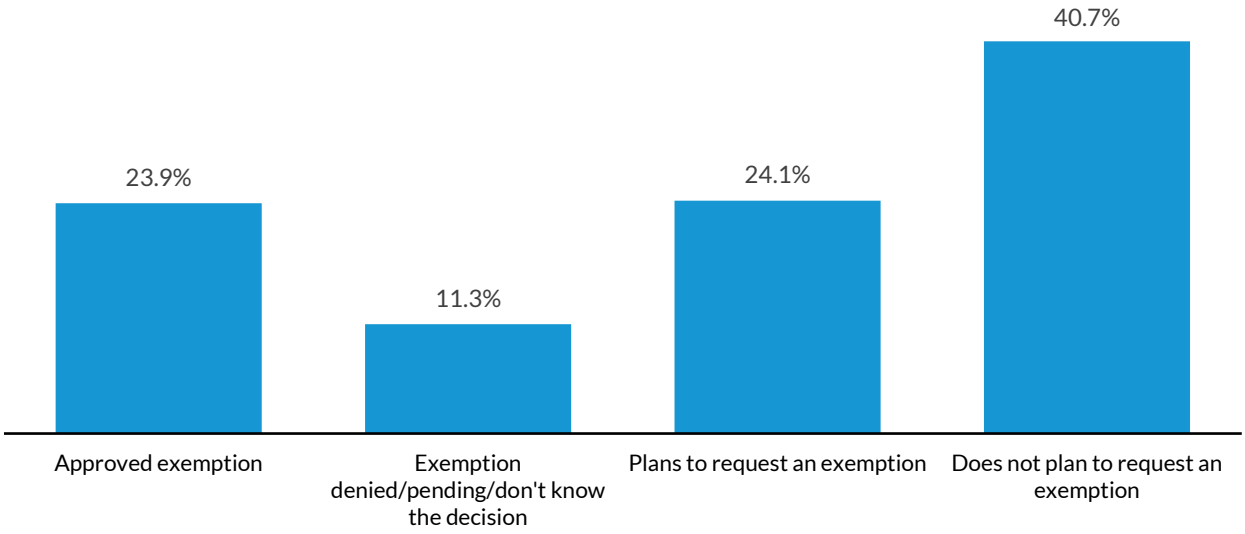
Notes: Estimate for "no" includes respondents whose families received a notice more than 12 months ago or did not receive a notice. Estimate for "don't know" includes respondents who did not know whether they received a notice or received one but did not know when. Estimates are not shown for 0.3 percent of respondents who did not answer one of the questions about receipt of a notice or when it was received.

1 in 4 Working-Age Adults Who Received a Notice and Are Currently Participating in SNAP Reported Having an Approved Exemption

Respondents who reported personally receiving a notice about SNAP work requirements were asked whether they requested an exemption the last time they received a notice and if their exemption request was approved. Among adults in this group who were receiving SNAP benefits at the time of the survey, 23.9 percent reported they had an approved exemption (figure 1). Another 11.3 percent were still waiting on the status of their exemption request, had their request denied, or did not know the final decision. An additional 24.1 percent planned to request an exemption, while 40.7 percent did not plan to request one.

FIGURE 1

Status of Work Requirement Exemption Requests Among Adults Ages 18–64 Reporting a Work Requirement Notice in the Last 12 Months and Current Family SNAP Receipt, December 2025



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Source: Well-Being and Basic Needs Survey, December 2025.

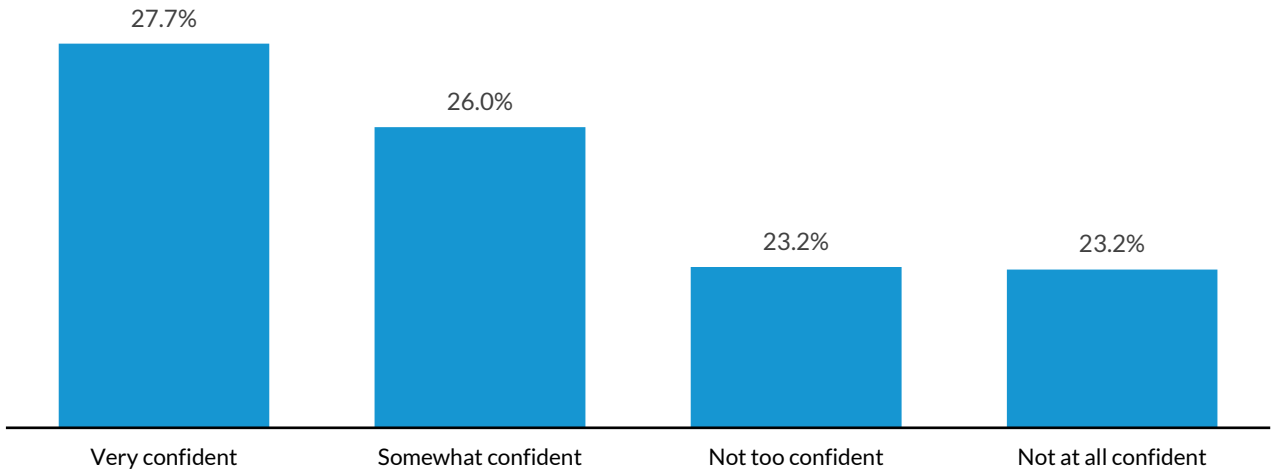
Notes: Estimates exclude those not reporting whether they requested an exemption or the status of their exemption request.

Nearly Half of Working-Age Adults Who May Be Subject to Work Requirements Are Not Confident They Can Meet the Requirements

Among adults who may be subject to SNAP work requirements—a group we define as those who received a work requirement notice, were receiving SNAP at the time of the survey, and did not have an approved exemption—nearly half were not confident in their ability to meet the requirement of working or engaging in work-related activities for 80 hours each month: 46.4 percent of these adults were not too or not at all confident that they could meet this requirement, while 53.6 percent were very or somewhat confident they could meet it (figure 2).

FIGURE 2

Confidence in Ability to Meet SNAP Work Requirements Among Adults Ages 18–64 Who Received a Notice About Work Requirements and Did Not Have an Approved Exemption, December 2025



Source: Well-Being and Basic Needs Survey, December 2025.
Notes: Estimates are shown for adults ages 18 to 64 whose families participated in SNAP in the last 12 months and were still receiving SNAP at the time of the survey, who received a notice about work requirements in the last 12 months, and who did not have an approved exemption.

Expanded Work Requirements Are Expected to Reduce SNAP Participation and Increase Food Hardship

In the wake of the OBBBA, SNAP work requirements and time limits now apply to a much larger segment of the population eligible for SNAP. The findings from our analysis indicate that many adults are not confident they can meet these requirements, and evidence shows that many factors may constrain program participants' ability to find and maintain sufficient work. Census data show that nearly one in three adults in the ABAWD category (not residing with a minor and not receiving Supplemental Security Income [SSI] or Social Security) report having a disability that may limit their ability to work, which they may have difficulty documenting during the application and recertification process (Bauer and East 2026). Further, SNAP participants more broadly are more likely to have jobs with volatile work hours and nonstandard work arrangements (e.g., gig economy work), making it difficult to work 80 hours each month consistently and provide documentation of those hours when applying for or renewing SNAP (Karpman, Hahn, and Gangopadhyaya 2019; Llobrera and Hall 2024).

Adults newly subject to this work requirement may face outsized barriers to meeting it and therefore face increased risk of losing benefits. For example, adults ages 55 and older may face labor market disadvantages because of age bias and discrimination, perceived skills gaps, and chronic health conditions or disabilities (Butrica and Mudrazija 2022).[2] Additionally, many adults will be affected by the loss of place-based waivers of the SNAP work requirement and time limit in areas with insufficient job opportunities. Under the OBBBA, states can now only apply for waivers for areas with an unemployment rate above 10 percent, which make up only a small fraction of communities. In 2025, before OBBBA, three states and DC had a statewide waiver and 24 states had partial waivers covering large regions with limited job opportunities. As of the third quarter of 2026, no states have a statewide waiver and only 14 states have partial waivers that cover a very small subset of counties.[3]

Though adults newly subjected to work requirements may be eligible for certain exemptions, these exemptions may be increasingly difficult to obtain. Even before OBBBA, adults with disabilities that limit their ability to work had difficulty providing the required documentation for an exemption, as accessing medical documentation can be a barrier for many.[4] In 2026, this may have become even more challenging. States are facing elevated federal scrutiny into their SNAP payment error rate, which is calculated based on how often they issue an over- or underpayment. Errors are often caused by either client-driven or administrator-driven errors in paperwork. Because states will face a significant cost penalty[5] based on a higher error rate, some are implementing strategies to reduce the likelihood of errors, such as implementing more stringent documentation requirements (versus allowing for self-attestation of a disability, as many states had done in the past; Whisman 2026).

Administrative data already show SNAP participation declined by approximately 12 percent between July 2025 and May 2026, though it is unclear what portion of that decrease stems from challenges related to work requirements, paperwork burdens, or other factors or policy changes.[6]

In 2027, families may face additional pressures on their household budgets as OBBBA provisions establishing work requirements and more frequent eligibility redeterminations for people with coverage through the Affordable Care Act Medicaid expansion take effect. Most people who participate in SNAP are also enrolled in Medicaid,[7] compounding the risks of loss of both food assistance and health insurance coverage. Many of these individuals will face challenges navigating work requirements in SNAP and Medicaid due to the lack of consistency in exemptions and qualifying activities between the programs. The difficulties states face in operationalizing the programmatic changes will further increase administrative burdens for those subject to either or both sets of work requirements.

Loss of SNAP benefits, and the potential loss of other federal safety net supports like Medicaid and child nutrition programs with enrollment processes that are tied to SNAP eligibility (Gutierrez 2026), is expected to increase food insecurity among low-income families across the country. State policymakers and program administrators can help mitigate the impact of expanded work requirements through several strategies, such as investing in processes at the state level to automatically qualify people for exemptions based on existing administrative data (such as existing receipt of SSI); using clear and accessible communications to increase awareness of upcoming changes in state notices, website updates, and social media; investing in training of staff and community-based organizations to help participants navigate documentation requirements and increase awareness of exemptions; and increasing availability of employment training programs and volunteer opportunities to help individuals meet their requirements if not otherwise exempt.

About the Survey

The WBNS is a nationally representative, annual survey of adults that monitors individual and family well-being in the context of a changing safety net. Launched by the Urban Institute in December 2017, the WBNS provides timely information on the challenges that households face in meeting basic needs, such as food, housing, and health care.

More than 10,000 adults ages 18 and older participated in the December 2025 round of the survey. Between 2017 and 2024, each survey round included more than 7,500 adults ages 18 to 64, and in 2025, the sample was expanded to include 2,500 adults ages 65 and older.

For each survey round, a stratified random sample is drawn from the KnowledgePanel, a probability-based internet panel that is maintained by Ipsos and includes households with and without internet access. Survey weights adjust for unequal selection probabilities from the panel and are poststratified to the characteristics of adults based on benchmarks from the Current Population Survey and the American Community Survey. Participants can complete the WBNS in English or Spanish. For further information on the survey design before the 2025 change in sampling, see Karpman, Zuckerman, and Gonzalez (2018).

Limitations

The estimates presented in this survey are not representative of the full universe of those subject to the ABAWD work requirement, as we use self-reported receipt of a notice as a proxy for being subject to the work requirement. Our estimates may not include populations like recent SNAP applicants who were already notified about the work requirement upon application and thus did not report receiving a notice. Some respondents who reported getting a notice may have misunderstood whether it was for SNAP's ABAWD or general work requirement. Further, we cannot ascertain whether those who reported receiving a notice before December 2025 were receiving this notice as a result of the July 2025 law. This is due to the staggered rollout of OBBBA-related changes to work requirements across states, as well as the fact that adults may have received a notice not related to an OBBBA change (such as if their area lost a waiver prior to OBBBA or if they were already subject to the requirement prior to OBBBA and are receiving a regular communication about their compliance[8]).

Notes

1 The work requirement and associated time limit for ABAWDs is separate from what is known as the "general work requirement" under SNAP, under which participants ages 16–59 must register for work, participate in SNAP employment and training or another work program if required by their state SNAP agency, take a suitable job if offered, and not quit a job or reduce work hours below 30 per week without a good reason. SNAP participants may be exempt from the general work requirement if they already work at least 30 hours a week, are caregivers for young children, or meet other criteria. See "SNAP Work Requirements," Food and Nutrition Administration, US Department of Agriculture, https://www.fna.usda.gov/snap/work-requirements.

2 Matt Swenson, "Worried You're Being Pushed Out of Your Job? You're Not Alone," AARP, March 2, 2026, https://www.aarp.org/work/age-discrimination/age-bias-survey-2026/.

3 See "Time Limit Waivers," Food and Nutrition Administration, US Department of Agriculture, last updated October 5, 2026, https://www.fna.usda.gov/snap/waivers/timelimit for list of states that have partial waivers. According to annual unemployment rate averages from 2025, only 15 counties (outside of Puerto Rico) would qualify for a waiver. "Tables and Maps," Local Area Unemployment Statistics, US Bureau of Labor Statistics, accessed October 7, 2026, https://www.bls.gov/lau/tables.htm.

4 Ashley Burnside, "SNAP Time Limits Can Reduce Access for Disabled People," CLASP, April 25, 2023, https://www.clasp.org/blog/snap-time-limits-can-reduce-access-for-disabled-people/.

5 Starting on October 1, 2027, states will be required to pay a portion of SNAP benefit costs, which were previously covered in full by the federal government, if their state's payment error rate is above 6 percent for fiscal year 2025 or 2026. The exact share will depend on their payment error rate, but in some cases this may result in millions, and in some states billions, of dollars added to their states' budget. See "H.R. 1 Provision: State Cost-Sharing of Food Benefits (Sec. 10105)," Food Research & Action Center, accessed October 7, 2026, https://frac.org/hr-1/state-cost-share.

6 Dottie Rosenbaum, Joseph Llobrera, Catlin Nchako, and Luis Nuñez, "SNAP Tracker: People Are Losing Food Assistance as the Republican Megabill Is Implemented," Center on Budget and Policy Priorities, https://www.cbpp.org/research/food-assistance/snap-tracker-people-are-losing-food-assistance-as-the-republican-megabill.

7 Jonathan Schwabish, "About 12 Million Households Receive Both Medicaid and SNAP. The Reconciliation Bill Puts Them at Risk," *Urban Wire*, Urban Institute, July 28, 2025, https://www.urban.org/urban-wire/about-12-million-households-receive-both-medicaid-and-snap-reconciliation-bill-puts-them.

8 For example, states are required to notify ABAWD SNAP recipients if they are about to lose benefits for not complying with work requirements (e.g., in the third countable month that they receive benefits but are not in compliance).

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