

Medicaid Work Requirements Implementation Series

Aligning Work Requirements Across SNAP and Medicaid to Support Public Benefit Continuity

The Supplemental Nutrition Assistance Program (SNAP) is the nation’s largest nutrition assistance program, providing over [22 million](#) low-income households with the purchasing power to buy the food essential for their health and well-being. The 2025 budget reconciliation bill (H.R. 1, now P.L. 119-21), signed into law on July 4, 2025, includes provisions to reduce federal spending on SNAP by almost [\\$187 billion](#) over the next 10 years (FY2025-2034), marking the largest funding reduction in the program’s history. These reductions will be achieved through expanded work requirements and other [significant changes](#) to the program.

What’s the issue? The SNAP reductions coincide with future reductions in federal Medicaid spending, also enacted through H.R. 1, which includes new work requirements for certain adults covered through Medicaid expansion. SNAP and Medicaid serve [largely overlapping](#) low-income populations including individuals and families who often experience economic hardship and poorer health as a result.

MEDICAID WORK REQUIREMENTS IMPLEMENTATION SERIES

With new federal work requirements for Medicaid eligibility enacted, states have an opportunity to design strategies that mitigate the risk of unintended disenrollment. This series from the Center for Health Care Strategies (CHCS) offers actionable approaches to support implementation that minimizes administrative burden and is informed by the experiences of Medicaid members.

Meeting SNAP work requirements [exempts](#) individuals from Medicaid work requirements. However, expanded SNAP work requirements may lead to fewer people qualifying for SNAP, and thus fewer qualifying as “specifically excluded” from Medicaid work requirements. As such, coordination between these programs is essential to ensure continued access to food and health care services for those who remain eligible. Without support and coordinated implementation efforts, these policy changes may present challenges for individuals navigating program requirements, potentially affecting access to benefits and worsening health outcomes.

What do new SNAP Work Requirements look like? [Prior to the passing of the 2025 budget reconciliation bill](#), SNAP had two sets of work requirements: general work requirements and the able-bodied adult without dependents (ABAWD) work requirements. This latter group had to meet a certain set of requirements to receive SNAP for longer than three months over three years. The bill’s passing [significantly expanded](#) these requirements through:

- **Expanded Age Range for ABAWDs:** The age range for ABAWDs previously applied to adults aged 18 to 54 and now extends to individuals up to 64 years of age (*Note: ABAWDs largely overlaps with those targeted by Medicaid work requirements*).

- **New Requirements for Parents and Caretakers:** Parents or caregivers whose youngest dependent child is 14 or older are now subject to work requirements. This is a change from previous rules where parents with children of any age were generally exempt.
- **Removal of Exemptions for Specific Vulnerable Groups:** H.R. 1 removes previous exemptions for veterans, individuals experiencing homelessness, and youth aging out of foster care. These groups are now required to meet work requirements to maintain their SNAP eligibility.
- **Harder to Obtain Waivers:** States can only waive requirements in areas where the unemployment rate exceeds 10 percent.

Exhibit 1. Comparing SNAP and Medicaid Work Requirements as Outlined in H.R. 1

Category	SNAP	Medicaid
Implementation Timeline	November 1, 2025, with existing ABAWD waivers terminating 30 days from October 3, 2025	December 31, 2026, or sooner through 1115 waivers
Work Requirements	<ul style="list-style-type: none"> • General work requirements: 30 hours per week • ABAWD Work Requirement: 80 hours per month 	80 hours per month
Population	<ul style="list-style-type: none"> • General work requirements: Ages 16-59 • ABAWD Work Requirement: Ages 18-64 	Adults aged 19-64
Exemptions	<ul style="list-style-type: none"> • Indian Health Service members • Caregivers (dependent child under the age of 14 or somebody with a disability) • Individuals already meeting work requirements under TANF or unemployment compensation • Individuals participating in a qualifying substance use disorder (SUD) treatment program • Pregnant individuals • Medically certified as unable to work due to physical or mental limitation • Studying in school or a training program at least half time 	<ul style="list-style-type: none"> • Indian Health Service members • Caregivers (dependent child under the age of 13 or someone with a disability) • Individuals already meeting work requirements under SNAP or TANF • Individuals participating in a qualifying substance use disorder (SUD) treatment program • Pregnant and postpartum individuals • Disabled veterans • Medically frail individuals (definition forthcoming from HHS) • Foster youth and former foster youth under the age of 26 • Incarcerated or recently incarcerated individuals • Short-term hardship
Outreach	State agencies must provide households with written notice and oral explanation at certification, recertification and whenever a new household member becomes subject to work requirements	Notice required in writing and one additional form of communication between June 30 and August 31, 2026
Verification Process	Look forward	One- to three-month look back period and data matching
Impact Estimates	Two million people estimated to lose some SNAP benefits due to implementation of work requirements	4.8 million people estimated to lose Medicaid coverage due to implementation of work requirements

For a more comprehensive crosswalk of SNAP and Medicaid work requirements, please see [this table](#) from the American Public Human Services Association.

Other SNAP Changes in H.R.1

Beyond work requirements, which extends to more categories of recipients than ever before, the following provides an overview of [additional changes](#) to SNAP eligibility, benefits, and program administration that aim to reduce federal spending, as outlined in H.R. 1:

- **Increases state financial burden:** Reduces federal contributions to states' SNAP food benefit costs for states with error rates greater than 5% and shifts administrative costs to states from 50% to 75%. States are projected to [double or even triple their current share of SNAP funding](#), with some facing increases of over 700%, or otherwise significantly reduce program availability overall.
- **Utility allowance cuts:** Changes how utility expenses are calculated for non-elderly or disabled households, likely leading to decreased monthly SNAP benefit amounts.
- **Limitations on future benefit increases:** Restricts future updates to the Thrifty Food Plan, the basis for calculating SNAP benefits, which may lead to SNAP benefits increasing by less over time.
- **SNAP-Ed Eliminated:** Terminates federal funding for SNAP-Ed, reducing support around evidence-based nutrition education for SNAP participants.
- **Changes to immigrant eligibility:** Limits eligibility to U.S. citizens and lawful permanent residents and excludes certain immigrant groups like refugees and people seeking asylum.

What are Opportunities for SNAP and Medicaid Alignment and Partnership?

Alignment and partnership across SNAP and Medicaid are critical to support the streamlined implementation of work requirements and facilitate continuous access to food and health care coverage for the individuals and families who rely on these programs.

Coordinate Medicaid-SNAP Work Requirement Verification Systems

To streamline processes and minimize unnecessary state expenditures, state Medicaid and SNAP-administering agencies can better coordinate work requirement verification systems. This will look different in each state based on that state's level of data integration. State data systems [exist on a continuum](#) from fully integrated, to aligned systems (i.e., processing dates), to no integration at all.

States with fully integrated systems can incorporate work-requirement-specific tracking and processes into their existing systems. States with aligned systems or no current integration can develop new data-sharing agreements to ensure work requirement verification is integrated efficiently and accurately across programs. State Medicaid agencies in aligned or non-integrated states can also [leverage](#) SNAP Eligibility and Enrollment (E&E) systems and SNAP Employment and Training (E&T) systems to screen for individuals completing SNAP work requirements and automatically exempt them from Medicaid work requirements.

States can leverage *ex parte* verification processes at all levels of integration to streamline eligibility and compliance efforts. This approach enables states to use available information to verify a member's status, minimizing the need for additional action from the member. *Ex parte* verification can help identify

members who qualify for work requirement exemptions and coordinate the verification process for those who are subject to requirements. [Most states](#) already use *ex parte* methods for determining SNAP/Medicaid eligibility and it is a useful strategy for [reducing administrative burdens](#) for both state eligibility workers and members.

H.R. 1 appropriates [\\$400 million](#) to support work requirement implementation, with \$200 million designated for direct distribution to states. States can leverage this funding to develop or bolster existing data verification systems.

Invest in Cross-Trained Workforce

At the staff level, states can invest in training eligibility workers and benefits specialists on eligibility criteria, work requirements, and exemptions across SNAP and Medicaid. This training can better equip staff to support individuals navigating these systems, reduce applicant burden, and improve administrative efficiencies. Investments could include technical assistance, such as live chat support or service representatives on phones, to provide a consistent resource for individuals facing work requirements. These efforts can increase the likelihood of eligible individuals keeping SNAP or Medicaid benefits and avoid the more time-consuming re-enrollment process, which is often more complex than a renewal in either program. A well-trained staff could also help reduce outreach costs by providing more accurate and efficient service and minimizing confusion around work requirement verification upfront.

At the leadership level, although SNAP and Medicaid are administered by different federal agencies and governed by distinct state regulations, there is an opportunity for alignment across agencies, given that many state Medicaid agencies and SNAP offices operate within the same government buildings and/or under the same parent agency. State leaders can develop cross-agency advisory committees and host regularly scheduled meetings for policy discussions and problem-solving related to the implementation of work requirements. Such cross-agency efforts can foster improved communication and a more coordinated approach to improving member experience as they navigate new work requirements.

Partner with Community-Based Organizations

Community-based organizations (CBOs) can also serve as trusted resources for work requirement support for both SNAP and Medicaid. CBOs can invest in staff training on H.R. 1 changes, use their communications channels to raise awareness about new work requirements with the communities they serve, and provide hands-on support for individuals meeting work requirements and verifying work and volunteer opportunities. For example, food banks — serving primarily low-income populations eligible for SNAP and Medicaid — are well positioned to serve a one-stop shop around work requirements. They can educate people about the new requirements, connect them to employment or volunteer opportunities, and offer on-site case workers to assist with work requirement verification. Organizations like [Feeding America](#), the largest network of food banks in the nation, are well positioned for providing work requirement supports across communities.

Looking Ahead

Access to SNAP and Medicaid is critical to maintaining health and well-being. Aligning work requirement verification and other processes across these programs can reduce the administrative burden for state staff and enrollees, making it easier for individuals to retain their public benefit coverage and avoid unnecessary disruptions in care and support.

At the same time, recent changes to how food insecurity is tracked at the federal level may complicate efforts to evaluate the impact of these policy shifts. In September 2025, the U.S. Department of Agriculture announced it would discontinue its annual Household Food Security Report — a key source of consistent data on hunger and food access. While alternative data sources may be developed, the change underscores the need for coordinated implementation and evaluation to ensure reforms do not unintentionally disrupt access to essential supports.



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