

Food Insecurity Policy Alert

To keep their monthly SNAP cash benefit, seven states allow SNAP ABAWD recipients to volunteer 12 to 24 hrs a month (not 80 hrs)

How state and county governments can help their SNAP Able Bodied Adults Without Dependents (ABAWD) recipients fulfill the new HR1/OBBBA Law time limits requirements so they do not lose their SNAP cash benefit.

Summary: A new law, passed as part of HR1/One Big Beautiful Bill Act (OBBBA), will require around 2.4 million SNAP Able Bodied Adults without Dependents (ABAWD) recipients to now comply with work requirements so that they can keep their SNAP benefit. There are three ways for a SNAP recipient to meet the ABAWD Work Rules and keep their SNAP benefits: 1) Paid or unpaid work for at least 20 hours per week (80 hours per month); 2) Learn job skills for 20 hours per week (80 hours per month) that can help you earn more money; 3) a combination of 1) and 2) adding up to 80 hours or 4) become a Community Service/Volunteer in a state approved workfare program. SNAP ABAWD recipients only have to volunteer for the number of hours based on their monthly SNAP benefit divided by the State minimum wage. It is the last option, Community Workfare, that most states have not been offering.

The policy alert is not meant to endorse or support the HR1/OBBBA new work requirements. The purpose of the policy alert is only to ask states to inform their SNAP recipients of the work rule options available to them so they can make an informed decision.

➤ **Under the USDA-FNS allowed workfare option, a SNAP ABAWD recipient can volunteer 3 to 6 hours a week, and keep their monthly SNAP cash benefit.** Only Arkansas, Georgia, Massachusetts, Michigan, New York State, Oregon and Washington States have issued guidance showing SNAP ABAWD recipients how they use the volunteer workfare option. Massachusetts, Michigan, New York State and Washington State, recognizing the gravity of the problem, are encouraging local organizations (including churches, mosques, synagogues, homeless shelter, food pantries, senior centers and youth programs) to offer volunteer opportunities to SNAP recipients so that they can fulfill the time limit requirement. ⁱⁱ

1. Which groups are affected by the new HR1/OBBB law: the following groups must now comply with the SNAP work rules.

- People ages 55 to 64.
- Caretakers of dependent children 14 or older
- Veterans
- People without housing
- People 24 or younger who aged out of foster care

According to the Congressional Budget Office (CBO), an estimated **2.4 million ABAWD recipients** are at risk of losing their SNAP benefit, in an average month over the 2025-2034 period, due to the passage of OBBBAⁱⁱⁱ. One million ABAWD recipients are no longer exempt due to removal of the waiver; another 1.4 million ABAWD recipients must now comply with the work requirement because HR1 changed their exemption status. A [state by state breakdown](#) with an estimate of the number of SNAP ABAWD recipients at risk of losing their monthly benefit due to the new work requirements was prepared by **Center on Budget and Policy Priorities** (6-27-2025). This group is comprised of SNAP ABAWD that will not meet any of the legal exemptions^{iv}. While the law went into effect on November 1 2025, the actual start date for compliance varies by state with most states requiring compliance as of January 1 2026. (a few states still have waivers in effect well into 2026). All SNAP ABAWD recipients will have 90 days to start meeting the new work requirements; if they cannot show any hours to meet the work requirement, after 90 days their SNAP monthly benefit will most likely be cut off (after the 90 days of noncompliance, unless the recipient starts to comply, they will not receive any SNAP benefit for the next 33 months). For state specific information on start date for work hours compliance, consult the website of the state agency responsible for administering SNAP.

2. The United States Department of Agriculture (USDA) regulations allow an Able Bodied Adult Without Dependents (ABAWD) SNAP recipient to meet the work requirement by volunteering at a community organization^v.

The United States Department of Agriculture-Food and Nutrition Services allows four options for fulfilling the time limit requirement for ABAWD to keep their monthly SNAP benefit:

§ 273.24 Time limit for able-bodied adults.

(a) *Definitions.* For purposes of the SNAP time limit, the terms below have the following meanings:

(1) *Fulfilling the work requirement* means:

(i) Working 20 hours per week, averaged monthly; for purposes of this provision, 20 hours a week averaged monthly means 80 hours a month;

(ii) Participating in and complying with the requirements of a work program 20 hours per week, as determined by the State agency;

(iii) Any combination of working and participating in a work program for a total of 20 hours per week, as determined by the State agency; **or**

(iv) Participating in and complying with a workfare program;

Source: <https://www.ecfr.gov/current/title-7/subtitle-B/chapter-II/subchapter-C/part-273>

By participating in a state SNAP agency administered workfare program, a SNAP ABAWD recipient can keep their monthly SNAP benefit by volunteering with a local community program (such as food pantries, soup kitchens, libraries, senior centers, afterschool/recreation youth programs, churches,

synagogues and mosques). The formula used for calculating the number of volunteering hours per month: “**Required hours = your monthly SNAP benefit amount ÷ State minimum wage**”^{vi}

Example offered by NYS Office of Temporary and Disability Assistance: if you get \$300 in SNAP monthly benefit and the state minimum wage in your area is \$16.50, then you have to complete 18 hours of community service or volunteer work each month. (18 hours x \$16.50 = \$300). Based on the example, an ABAWD SNAP recipient can meet the new 80 hrs. work requirement by volunteering only **18 hours per month or 4.5 hours per week**. While the NYS example is using the maximum, the average SNAP monthly benefit for an individual is around \$188 to \$204^{vii} (which means around 3 hrs. per week or 12 hours per month).

The USDA-FNS has issued extensive guidance on how states can offer workfare programs for ABAWD’s. A state can offer workfare in its USDA-FNS approved Employment and Training Plan or with a state operated voluntary or comparable workfare program^{viii}.

NEW SNAP WORK REQUIREMENTS		
SNAP RECIPIENTS	WORK, VOLUNTEER OR TRAINING PROGRAM 80HRS	RECEIVE BENEFITS
18-64 W/ DEPENDENT 14 OR YOUNGER	✗	✓
18-64 W/ OUT DEPENDENT 14 OR YOUNGER	✓	✓
18-64 W/ OUT DEPENDENT 14 OR YOUNGER	✗	✗

Program caveat: Volunteering is an option that all SNAP ABAWD recipients should be made aware of as they decide how to meet the new work rule requirements. However, even with a little as 3 hours per week, the community volunteer option still does have significant practical implementation concerns and limitations. A thorough discussion of these concerns and limitations was provided by [Food Research Action Center \(FRAC\)](#)^{ix}.

3. Volunteer hours will vary by state from 3 to 6.5 hours per week (depending on state minimum wage). Most SNAP recipients reside in the states where they can keep their monthly benefit by volunteering 3 hours per week. The formula for how many hours per week a SNAP must volunteer depends on the state minimum wage (and monthly SNAP benefit). Minimum wage varies significantly by state with a high of \$17.33 in Washington State to a low of \$7.25 in Texas (see page 10 for minimum wage schedule for all 50 states). The following states have a minimum wage of \$13.00 or higher: California, Colorado, Connecticut, Delaware, Florida, Hawaii, Illinois, Maine, Maryland, Massachusetts, Michigan, Missouri, Nebraska, New Jersey, New York, Oregon, Rhode Island, Vermont and Washington State.

- 4. Arkansas, Georgia, Massachusetts, Michigan, New York, Oregon and Washington State all have posted guidance showing how SNAP recipients can keep their monthly benefit by volunteering a few hours a week:** Below is a cut and paste of guidance showing the volunteer option with the minimum wage formula on the websites of agencies that administer their state SNAP program: **Georgia Division of Family and Children Services , Massachusetts-Department of Temporary Assistance, Massachusetts Department of Transitional Assistance, [Michigan Department of Health and Human Services](#), New York State Office of Temporary and Disability Assistance and Washington State Department of Social and Health Services.** In addition to guidance posted on the state’s SNAP website, every state is required to send a SNAP recipient a work letter. The work letter should also include similar language explaining the options available to meet the work requirement including the SNAP benefit divided by minimum wage formula. Here is a [sample of work letter](#) from Massachusetts Department of Temporary Assistance which explains how the work requirement can be met by volunteering using the benefit divided by minimum wage formula. The volunteer option has been highlighted in **yellow**.

Arkansas:

Arkansas SNAP CERTIFICATION MANUAL

3700 Workfare

SNAP Manual 01/01/19

The Comparable Workfare program establishes a means by which an able bodied adult who is subject to the 3 month time limit may fulfill the work requirement in order to remain eligible for SNAP benefits.

Comparable Workfare providers are limited to churches, local government agencies, such as any federal, state, county, city, or town, and other non-profits who are willing to meet the reporting requirements to establish the individual’s participation and supervision. In addition, a Comparable Workfare program may operate in any county.

The DCO eligibility worker may refer individuals for Comparable Workfare if work sites are known or the individual may find his or her own placement with an authorized agency. Participation in a Workfare program must be monitored to assure that an able bodied adult who is subject to the RTW does not receive additional months of SNAP benefits while not meeting the RTW.

3730 Determining Formal and Comparable Workfare Hours

The household’s obligation of work hours each month will be calculated by dividing the household’s authorized monthly SNAP benefit amount (before recoupment) by the current state or federal minimum wage, whichever is greater. Fractions are rounded down.

NOTE 2: For E&T Work Experience and Workfare Programs, the household’s obligation of work hours required to meet the RTW will be calculated by dividing the household’s authorized monthly SNAP benefit amount (before recoupment) by the current state or federal minimum wage, whichever is greater. Fractions are rounded down **EXAMPLE:** The household receives \$194 monthly SNAP benefits.

$194 \div \$8.50$ (2017 State Minimum Wage) = 22.82 **The individual needs 23 hours per month to meet the RTW rather than 80.**

Source: <https://humanservices.arkansas.gov/wp-content/uploads/Supplemental-Nutrition-Assistance-Program-Policy-Manual4.11.22.pdf>

Georgia:

<p>Comparable Workfare</p>	<p>Comparable Workfare Activities increase access to qualifying components for able-bodied adults without dependents (ABAWDs). Georgia is adding comparable workfare to its allowable component opportunities, which is intended to provide ABAWDs with another means to meet the ABAWD work requirement. Comparable workfare is expected to be widely utilized in areas where connections to the SNAP Works Program or other work programs may be limited. Under comparable workfare, the ABAWD is responsible for the following:</p> <ul style="list-style-type: none"> • arranging their own placement at a nonprofit or for-profit provider; • reporting participation; and • verifying hours of participation to their SNAP case manager. <p>The number of monthly required hours is obtained by dividing the SNAP AU's monthly allotment by the federal minimum wage. For example: \$292 (allotment amount)/\$7.25 (current minimum wage) = 40.27; the ABAWD must complete 40 hours per month for comparable workfare. Note: Only use whole numbers and do not round. Hours may not exceed 30 hours weekly. Refer to Form 858 – Comparable Workfare: A Guide for ABAWDs.</p> <p>If more than one ABAWD is receiving SNAP benefits in the SNAP household, the hours must be divided between all ABAWDs in the AU. The eligibility specialist will maintain records to support the issuance of benefits to comparable workfare participants beyond the third month of eligibility. The SNAP eligibility specialist will track each month of the State's fixed 36-month period to ensure compliance with the ABAWD time limit and work requirements.</p> <p>ABAWDs who have exhausted their three months under the time limit should not receive a fourth month of SNAP benefits without providing proof they have regained eligibility through their comparable workfare activity.</p> <p>Source: https://pamms.dhs.ga.gov/dfcs/snap/3355/</p> <p>What is comparable workfare?</p> <p>Georgia's Comparable Workfare program is an unsalaried placement at a supervised worksite with a public or private non-profit provider. All state, federal, county, and city government agencies are potential workfare sponsors. Comparable Workfare provides participants with opportunities to develop basic work habits, practice skills, and demonstrate the ability to learn new skills to a prospective employer.</p> <p>ABAWDs may self-initiate a Comparable Workfare activity at community service program sites that are serving a useful community purpose in the field of health, social service, environmental protection, education, urban and rural development, welfare, recreation, public facilities, public safety, or child care.</p> <p>Source: https://dfcs.georgia.gov/services/snap/able-bodied-adults-without-dependents</p>	<p>The ABAWD is required to comply with work registrant general work requirements only. Refer to 3350 Work Registration.</p>
-----------------------------------	---	--

MASSACHUSETTS:



Massachusetts Department of Transitional Assistance
Supplemental Nutrition Assistance Program

ABAWD Work Program Participation Report

Give this form to DTA:

- Upload to DTA Connect
- Fax to 617-887-8765
- Mail to the DTA Document Processing Center: P.O. Box 4406, Taunton, MA 02780
- Scan at a local DTA office

Part 1: ABAWD PARTICIPATION INFORMATION

Name of ABAWD Participant:		Participant's Agency ID Number:		Date:	
Mailing Address:		Telephone Number:			

You must meet the work rules for Able-Bodied Adults without Dependents (ABAWDs). Based on information known to DTA, you are:

- not exempt from the work rules,
- not working at least 20 hours per week, or
- not in an employment/training activity at least 20 hours per week.

If you are exempt, working or in employment/training, please call 877-382-2363 to let us know. Otherwise, to keep getting SNAP benefits, you must volunteer at a non-profit or public organization. To make sure that a community service site you choose meets the requirement, or for help finding a site, visit SNAPPathtoWork.org or call the **SNAP Path to Work Line at 888-483-0255**.

You may use this form to prove that you will be volunteering at a non-profit or public organization. The number of hours that you must volunteer is determined by dividing your monthly SNAP benefit by the current Massachusetts minimum wage. Example: If you get \$150 per month in SNAP and the state minimum wage is \$15, you must volunteer for 10 hours per month.

Source: <https://www.mass.gov/info-details/work-rules-for-snap-clients>
<https://www.mass.gov/doc/abawd-work-program-participation-report-wppr-english-0/download>

Massachusetts: Become a Volunteer Site

If your organization is a public or nonprofit entity that can offer volunteer opportunities for DTA clients, we would love to partner with your organization and list it on our website, SNAPPathtoWork.org. To add your organization to the site, please complete the **Volunteer Site Form**.

Find answers to common questions about becoming a SNAP Work Rules volunteer site in the SNAP Work Rules Volunteer Site Guide, including information on participation forms, requirements, and site responsibilities. [Open PDF file, 211.31 KB, SNAP Work Rules Volunteer Site Guide](#)

Michigan:

Work Requirements for Food Assistance

Able-bodied adults without dependents who are between 18–64 and have children 14 and older, with some deferral exceptions for Native Americans, will now be subject to work requirements to access to SNAP benefits. Beginning Monday, Dec. 1, all counties will implement Time Limited Food Assistance (TLFA) work requirements under new federal guidelines established in H.R. 1, except for the following counties and cities

- **Counties:** Alcona, Alger, Arenac, Cheboygan, Iosco, Iron, Luce, Mackinac, Montmorency, Oceana, Ogemaw, Oscoda, Presque Isle, Roscommon and Schoolcraft.
- **Cities:** Bay City, Detroit, Eastpointe, Flint, Jackson and Saginaw.

How can I meet the SNAP work requirements?

- **Employment** – work at least 80 hours per month (20 hours per week average) or receive monthly average earnings of at least 20 hours per week multiplied by the federal minimum wage.
 - Note: Work includes work in exchange for money, including self-employment, work in exchange for goods or services (in-kind) and/or unpaid work (volunteer).
- **Self-Initiated Community Service** – unpaid work for a nonprofit organization in exchange for SNAP benefits. The number of hours worked must equal the SNAP group’s monthly benefit amount divided by the state minimum wage.
- **Michigan Works! Agency (MWA) Employment and Training program** (not available in all counties) – participate 80 hours per month (20 hours per week average) in an employment and training program. Individuals have the option to meet their monthly work requirement by choosing to participate in a workfare activity through MWA. The number of hours worked in the workfare activity must equal the SNAP group’s monthly SNAP benefit divided by the state minimum wage.

Food assistance recipients who received a full calendar month of SNAP benefits and do not meet their monthly TLFA work requirements, qualify for deferral or who provide a good cause reason will receive a “countable month.” An individual may only receive three countable months within the 36-month period.

Self-Initiated Community Service

Self-initiated community service (SICS) is unpaid work for a nonprofit organization in exchange for FAP benefits. The number of hours worked must equal the monthly FAP benefit divided by the State minimum wage, as determined by Bridges. Local MDHHS offices may maintain a list of nonprofit organizations willing to accept volunteers.

example: In a single-member case with \$292 in monthly FAP benefits, the individual must perform 23 hours per month of community service ($\$292 / \text{state minimum wage} = 23.39 \text{ hours}$).

Source: <https://www.michigan.gov/mdhhs/assistance-programs/food/learn-more/work-requirements>

NEW YORK STATE:

Keep Your SNAP Benefits

If you are between 18 and 64 years old and do not live with a child under age 14, you will lose your SNAP benefits unless you meet new rules from the Federal government. These new work requirements apply to “Able-Bodied Adults Without Dependents” (ABAWDs).

If you do not meet these work rules, you will only be able to receive Supplemental Nutrition Assistance Program (SNAP) benefits for three months in a three-year period. We want to help you continue to receive your SNAP. You can act to keep your SNAP by doing one of three items listed below.

Three Ways to Meet the ABAWD Work Rules and Keep Your SNAP Benefits:

1. Paid or unpaid work for at least 20 hours per week (80 hours per month)

Examples include:

- Having a job where you work at least 20 hours per week or earn at least \$217.50 per week, even if you work less than 20 hours a week.
- Doing in-kind work by exchanging your services for something other than money for at least 80 hours a month (for example, doing building maintenance in exchange for a reduction in rent).

2. Learn job skills for 20 hours per week (80 hours per month) that can help you earn more money.

Examples include:

- Doing job searches, workshops on resumé writing, or other training approved by your local social services district. Some of these activities can be done online at websites like JobZone.labor.ny.gov and dol.ny.gov/virtual-career-center-ind.
- Participate in job skills training programs and/or educational activities including college courses, certifications, or credential programs that help you prepare for work and English language instruction.

3. Community Service/Volunteer

The number of hours you would need to participate in community service or volunteer work is based on your SNAP benefit divided by the state minimum wage. For example, if you get \$300 and the state minimum wage in your area is \$16.50, then you have to complete 18 hours of community service or volunteer work each month. ($\$300 \div \$16.50 = 18$ hours).



Helping ABAWDs Can Help Your Community Organization

Interested in becoming a volunteer site for ABAWDs?

If your organization is a public or nonprofit entity that can offer volunteer opportunities, consider becoming a volunteer site for ABAWDs.

Giving ABAWDs volunteer opportunities can:

- Increase your community impact by getting more people involved in your organization's activities
- Help people gain skills that could lead to better jobs and less need for public assistance.

You may make the opportunities available directly to ABAWDs you work with and/or offer opportunities. The local department of social services can refer individuals to your organization. A complete listing of social services offices can be found by visiting:

otda.ny.gov/workingfamilies/dss.asp.



CBO Partnership Pathways for Community Service and Volunteer Engagement Opportunities

If your Community-Based Organization or agency is interested in partnering with HRA to offer community service or voluntary engagement opportunities to support cash assistance and SNAP recipients' compliance with work requirements, please complete the CBO Provider Inquiry Form linked below. This form allows us to assess your program's capacity, structure, and readiness so we can route you to the appropriate provider pathway: the **Community Service Provider (CSP)** track for high-touch organizations that can support structured, compliance-driven service activities, or the **Self-Enrolled Voluntary Service Provider (SEVSP)** track for light-touch programs offering voluntary, small-scale opportunities. Your submission enables our team to determine the correct pathway and ensure you receive the appropriate guidance and next steps. **CBOs interested in being considered should begin by completing the inquiry form which can be accessed [HERE](#).**

Oregon:

Time limits in the Supplemental Nutrition Assistance Program (SNAP)

Requirements for Able-bodied Adults Without Dependents (ABAWDs)

Frequently asked questions

Q5: How do I know how many hours of work-related activities I need to meet the requirement?

Your DHS worker will help you figure out what you need to do.

- If you are not employed, you need to do work activities for 20 hours a week.
- If you are employed less than 20 hours a week, you need to add enough work activities to get to a total of 20 hours a week.

You also can ask to be in the Workfare program. In Workfare, you are assigned to a public or private non-profit agency as a volunteer. You volunteer for five hours a week instead of doing 20 hours of work activities. Workfare spaces are limited so ask your DHS worker about it right away.

Q6: What kinds of work activities can I do?

Your DHS worker will get you started and may involve a local partner in looking at the choices with you. Together, you will decide which work activities are the best fit for you. There are several choices:

- Work 20 hours per week for pay, as a volunteer or in-kind;
- Do work search for up to 9 hours per week, plus other activities to get to a total 20 hours per week;
- Be in a program under the Workforce Innovation and Opportunity Act;
- Be in a displaced worker program under section 236 of the Trade Act of 1974;
- Be in an approved training program; or,
- Be in Workfare where you volunteer at a private or public non-profit agency for five hours a week.

Washington State:

Workfare for People with ABAWD Designation

This page outlines general information regarding Washington's workfare activity for people **identified as ABAWD** customers and what the participation requirements are in order to maintain eligibility for **Basic Food assistance**.

Topics:

- What are the ABAWD requirements?
- What is Workfare?
- Workfare objectives.
- How to participate in Workfare.
- Workfare sites.
- Agencies interested in providing Workfare opportunities.

What are the ABAWD requirements?

If you are person designated as ABAWD and you live in a **non-exempt area**, you will only receive three months of Basic Food benefits unless you do one or more of the following:

- Work at least 20 hours per week averaged monthly (80 hours per month).
- **Volunteer in the community through Workfare monthly** (the number of volunteer hours is determined based on the benefit amount divided by state or local city minimum wage).
- Participate in state-approved employment or training programs. Please see a list of approved programs. This page will be updated as new programs are added.

What is Workfare?

Workfare is an opportunity to meet participation requirements by volunteering with a contracted agency or nonprofit. Some main points of Workfare are:

- Workfare sites are only in the counties with ABAWD participation requirements.
- Workfare host agencies are nonprofit organizations, religious organizations or existing employment and training providers contracted with DSHS.
- Workfare sites allow people to work under supervision and direction to gain valuable work experience and meet work requirements.
- Workfare sites do not place participants on an assignment that is a result of a labor dispute.

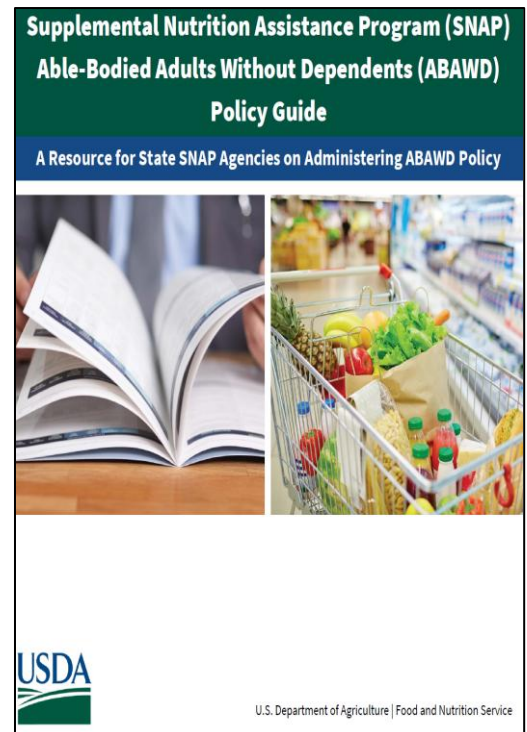
Sources: <https://www.dshs.wa.gov/workfare>; <https://app.leg.wa.gov/WAC/default.aspx?cite=388-444-0040&pdf=true>

5. USDA-FNS SNAP (2023) work rules guidance allows for two ways for a state to operate a workfare program:

The United States Department of Agriculture-Food and Nutrition Services (USDA-FNS) allows states to operate a workfare program in two ways: a state can include workfare as a service in its annual [SNAP Employment and Training Plan](#); a state can also set and operate its own workfare program. For the latter, USDA-FNS requires states and localities to submit the plan for approval. Approval must be granted within 30 days. Here is a cut and paste of [Supplemental Nutrition Assistance Program \(SNAP\) Able-Bodied Adults Without Dependents \(ABAWD\) Policy Guide. A Resource for State SNAP Agencies on Administering ABAWD Policy](#) workfare guidance.

4.2 Workfare

Time-limited participants can participate in multiple types of workfare programs to meet the ABAWD work requirement. In the context of SNAP, workfare is traditionally a household responsibility that is shared among all work registrants in the household. Workfare generally requires fewer than 80 hours per month to meet the ABAWD work requirement. The maximum monthly hours for workfare are calculated by dividing the household allotment by the higher of the Federal or State minimum wage. The State agency decides how to apportion hours among work registrants in the household but must ensure that it never requires a person to work more than 30 hours per week total (including workfare hours and any other hours worked in any compensated capacity). Prior to making a workfare assignment, the State agency may establish a job search period of up to 30 days following initial SNAP certification. This job search activity is part of the workfare assignment. The job search period may only be conducted at certification, not at recertification. The primary types of workfare programs that the State agency could offer time-limited participants are described below.



Optional Workfare Programs
Description: Workfare programs operated by political subdivisions outside of the SNAP E&T program. Political subdivisions include any county, city, town, or parish. Political subdivisions must submit workfare plans to State agencies and FNS.
Hours Required: Hours equal to the result obtained by dividing a household’s SNAP allotment by the higher of the applicable Federal or State minimum wage.
Funding: Local and/or State agency government funding and 50 percent Federal reimbursement. State agency may not use 100 percent E&T grant. Political subdivisions are eligible for workfare savings.
Voluntary Workfare Programs

<p>Description: Workfare programs with no disqualification for a failure to comply because participation is voluntary. May be operated by the State agency or local political subdivisions. Activities must be described in a workfare plan.</p>
<p>Hours Required: Work hours are negotiated between State and household. Cannot exceed hourly requirements of mandatory workfare programs.</p>
<p>Funding: Same as optional workfare programs.</p>
<p>Comparable Workfare Programs</p>
<p>Description: Similar to other workfare options, except that time-limited participants may be responsible for finding their own public service placement. The time-limited participant is responsible for arranging to have their participation reported to the local SNAP office and for verifying hours. May be operated by the State agency or local political subdivisions.</p>
<p>Hours Required: May use a range or SNAP allotments and corresponding fixed participation hours. The maximum hours worked weekly, combined with any other hours worked for compensation, must not exceed 30 hours per week.</p>
<p>Funding: Same as optional workfare programs.</p>

USDA FNS Standard Approval Timelines for submitting a State Optional Workfare Program: 30-Day Initial Review: Once a state agency submits a plan or an amendment to include a workfare program, the FNS Regional Office has 30 days to approve, deny, or request additional information.

- 6. Current State SNAP Employment and Training Programs only have capacity to serve around 4% of all SNAP recipients subject to the work requirements.** A SNAP ABAWD can continue to receive their monthly cash benefit if they enroll in a work/training program that is based on at least 80 hours of training and work experience skills per month. The USDA-FNS has operated the SNAP Employment and Training Program (SNAP E&T) for more than 35 years. Under the SNAP E&T program, each state contracts out services to job preparedness and training providers. In 2023, the total SNAP E&T budget was around \$650 million. Once a year, all 50 states submit an SNAP E&T plan to USDA-FNS for approval of use of funds.

States use flexible E&T funding to design programs that help SNAP recipients gain skills, education, or experience to help them obtain regular employment. States have a great deal of flexibility in designing E&T programs that meet the needs of their participants and local economy.

The USDA-FNS publishes an annual report on program operating data ([USDA EXPLANATORY NOTES – FOOD AND NUTRITION SERVICE](#)). The most recent annual reports, [2023](#), [2024](#) and [2025](#), include the following data on the capacity of the SNAP E&T program to serve work requirement recipients. For these past three years, the gap between the number of SNAP recipients subject to the time limits work requirements and the SNAP E&T programs capacity to serve varied only slightly at around 4%. Below is a cut and paste from the past three years:

“In 2023, States served an estimated 315,203 participants through their E&T programs. In 2022, States reported that approximately 10.3 million participants were subject to SNAP work requirements and registered for work, per the FNS-583 report analysis data as of December 19, 2022. A majority of SNAP participants are exempt from work requirements due to age, disability, caregiver responsibilities, or because they are already working or participating in a work training program. In 2021, States served an estimated 214,000 participants through their E&T programs.”^x

What is abundantly clear is that the state administered SNAP E&T programs offers only a small number of SNAP recipients an opportunity to enroll and fulfill their time limit work requirement to keep their monthly SNAP benefit. If states are not also offering a volunteer workfare option, independent of their official SNAP E&T plan, then the only way SNAP ABAWD’s can continue to receive SNAP is by working (or a combination of work and volunteering) 80 hours a month.



- 7. Massachusetts, Michigan, New York and Washington State are leading the way by encouraging community organizations to offer SNAP ABAWD recipients opportunities for volunteering:** States are scrambling to implement the new OBBBA work rules^{xi}. Every state has already posted the work requirements for people that are at risk of losing their SNAP exemption due to OBBBA becoming law. Massachusetts [Department of Transitional Assistance](#) (DTA), and New York NYS-Office of Temporary and Disability Assistance (OTDA) are not only informing ABAWD SNAP recipients of the 18 hours a month volunteer option, but also created the documentation forms that can be used by community groups running volunteer programs to confirm compliance. Massachusetts, New York and [Washington State](#), are encouraging community organizations including, food pantries, churches, synagogues and mosques to offer volunteer opportunities to SNAP ABAWD recipients. For the rest of country, states and municipalities, should consider following the example of these four states. No need to reinvent the wheel when models already exist. Otherwise, it’s highly likely hundreds of thousands of people will lose their monthly SNAP benefit.

Minimum wage by state for 2026

State	2026 Minimum Hourly Wage	2025 Minimum Hourly Wage
Alabama	\$7.25	\$7.25
Alaska	\$14.00* (effective July 1, 2026)	\$13.00
Arizona	\$15.15 (general)*	\$14.70
Arkansas	\$11.00	\$11.00
California	\$16.90	\$16.50
Colorado	\$15.16 (general)*	\$14.81
Connecticut	\$16.94*	\$16.35
Delaware	\$15.00	\$15.00
Florida	\$15.00* (effective Sept. 30, 2026)	\$14.00
Georgia	\$7.25	\$7.25
Hawaii	\$16.00	\$14.00
Idaho	\$7.25	\$7.25
Illinois	\$15.00	\$15.00
Indiana	\$7.25	\$7.25
Iowa	\$7.25	\$7.25
Kansas	\$7.25	\$7.25
Kentucky	\$7.25	\$7.25
Louisiana	\$7.25	\$7.25
Maine	\$15.10 (general)*	\$14.65
Maryland	\$15.00	\$15.00
Massachusetts	\$15.00	\$15.00
Michigan	\$13.73 (general)	\$12.48
Minnesota	\$11.41 (general)*	\$11.13
Mississippi	\$7.25	\$7.25
Missouri	\$15.00 (general)*	\$13.75
Montana	\$10.85*†	\$10.55
Nebraska	\$15.00*	\$13.50
Nevada	\$12.00*	\$12.00
New Hampshire	\$7.25	\$7.25
New Jersey	\$15.92 (general) \$15.23 (for seasonal employees and small employers that have six or fewer workers)*	\$15.49 (general) \$14.53 (for seasonal employees and small employers that have six or fewer workers)
New Mexico	\$12.00	\$12.00
New York	\$17.00 (New York City, Nassau County, Suffolk County and Westchester County) \$16.00 (for the rest of the state)*	\$16.50 (New York City, Nassau County, Suffolk County and Westchester County) \$15.50 (for the rest of the state)
North Carolina	\$7.25	\$7.25
North Dakota	\$7.25	\$7.25
Ohio	\$11.00 (for employers with annual gross receipts of \$405,000 or more)	\$10.70 (for employers with annual gross receipts of \$394,000 or more)
Oklahoma	\$7.25	\$7.25
Oregon	\$15.05 (general) \$16.30 (Portland Metro Area) \$14.05 (nonurban counties)*	\$15.05 (general) \$16.30 (Portland Metro Area) \$14.05 (nonurban counties)
Pennsylvania	\$7.25	\$7.25

State	2026 Minimum Hourly Wage	2025 Minimum Hourly Wage
Rhode Island	\$16.00	\$15.00
South Carolina	\$7.25	\$7.25
South Dakota	\$11.85 (general)*	\$11.50
Tennessee	\$7.25	\$7.25
Texas	\$7.25	\$7.25
Utah	\$7.25	\$7.25
Vermont	\$14.42 (general)*	\$14.01
Virginia	\$12.77*	\$12.41
Washington, D.C.	\$17.95*	\$17.95
Washington	\$17.13 (general)*	\$16.66
West Virginia	\$8.75	\$8.75
Wisconsin	\$7.25	\$7.25
Wyoming	\$7.25	\$7.25

Notes and Sources:

1. How States and Cities can help their SNAP ABAWD recipients meet the new OBBBA Law requirements so they do not lose their SNAP benefit Policy Alert was prepared by [David Rubel, Public Policy Consultant](#) January 2026.
2. Georgia and Washington State do mention the volunteer option based on minimum wage on their website but do not have any information on how community organizations can enroll SNAP ABAWD recipients to meet their work requirement. The volunteer guidance was found on five states so far. The Policy Alert will be updated as more states post the volunteer guidance.
3. **Congressional Budget Office August 11 2025:** CBO estimates that together those provisions will reduce participation in SNAP by roughly 2.4 million people in an average month over the 2025-2034 period. Of those people, about 800,000 will be able-bodied adults through age 64 who do not live with dependent children. Another 300,000 will be able-bodied adults ages 18 to 64 who live with children who are age 14 or older. And roughly 1 million will be able-bodied adults ages 18 to 54 (or 18 to 49, starting in 2031) who do not live with dependents but who, in CBO's January 2025 baseline projections (which preceded the law's enactment), would have received a waiver from the work requirements. CBO estimates that the reductions in participation for veterans, people experiencing homelessness, and people ages 18 to 24 who were in foster care when they turned 18 will be partially offset by increases in participation among American Indians, resulting in a net reduction in SNAP participation of 300,000 people in those groups. Source: <https://www.cbo.gov/system/files/2025-08/61367-SNAP.pdf>
4. **SNAP ABAWD exemptions:**
 - You are younger than age 18, or age 65 or older,
 - Someone in your household is younger than age 14,
 - You receive disability benefits from a public or private source, such as Veterans Affairs or state disability benefits,
 - You are pregnant,
 - You are unable to work at least 80 hours per month because of a physical or mental health reason,
 - You are an Indian, Urban Indian, California Indian, or other Indian eligible for the Indian Health Services,
5. **USDA-FNS regulations:** "Individuals can continue receiving SNAP beyond the three-month time limit by working, participating in a qualifying work program (including SNAP E&T), or any combination of the two, for at least 20 hours per week (averaged monthly to 80 hours per month). Individuals can also meet the time limit by participating in and complying with workfare for the number of hours assigned (equal to the result obtained by dividing a household's SNAP allotment by the higher of the applicable Federal or State minimum wage). For the purposes of the time limit, working includes unpaid or volunteer work that is verified by the State agency. These requirements are sometimes referred to as the ABAWD" source: <https://www.govinfo.gov/content/pkg/FR-2024-12-17/pdf/2024-29072.pdf>
6. **Formula:** The number of hours you would need to participate in community service or volunteer work is based on your SNAP benefit divided by the state minimum wage. For example, if you get \$300 in SNAP and the state minimum wage in your area is \$16.50, then you have to complete 18 hours of community service or volunteer work each month. ($\$300 \div \$16.50 = 18$ hours). Volunteer or do a Work Experience Program assignment can be done with a local nonprofit or public service organizations (such as food pantries, parks, or libraries). Source: NYS OTDA
7. U.S. Department of Agriculture, Food and Nutrition Service, Evidence, Analysis, and Regulatory Affairs Office, Characteristics of Supplemental Nutrition Assistance Program Households: Fiscal Year 2023, by Mia Monkovic and Ben Ward. Project Officer, Aja Weston. Alexandria, VA, 2025. <https://www.fns.usda.gov/research/snap/characteristics-fy23>

-
8. United States Department of Agriculture-Food and Nutrition Services- [SNAP E&T State Plan Handbook](#) 2022. United State Department of Agriculture-Food and Nutrition Services **[Supplemental Nutrition Assistance Program \(SNAP\) Able-Bodied Adults Without Dependents \(ABAWD\) Policy Guide](#)** A Resource for State SNAP Agencies on Administering ABAWD Policy 2023
 9. **[Q&A: Understanding SNAP Time Limits and the Burden of Expanded Work-for-Food Requirements](#)** BY GINA PLATA-NINO, JD, SNAP DEPUTY DIRECTOR August 8, 2025
 10. [USDA EXPLANATORY NOTES – FOOD AND NUTRITION SERVICE](#)) including the most recent annual reports: [2023](#), [2024](#) and [2025](#),
 11. **NY Focus:** [“Blindsided’ Counties Struggle to Implement Trump’s SNAP Work”](#) Rules by Jie Jenny Zou.

Sources:

- [Center on Budget and Policy Priorities](#),
- [Food Research Action Center \(FRAC\)](#),
- NYS Office of Temporary and Disability Assistance,
- Massachusetts Department of Transitional Assistance,
- United States Congressional Budget Office.
- United State Department of Agriculture-Food and Nutrition Services.
- Propel