

# Advocate's Checklist:

## Helping Transition-Age Youth Keep Their SNAP Benefits



This checklist is designed for advocates, caseworkers, mentors, and others who help transition-age youth with foster care experience and housing insecurity keep or apply for Supplemental Nutrition Assistance Program (SNAP) benefits as new work requirements and time limits are implemented as part of the budget reconciliation law, H.R. 1.

Many transition-age youth face food insecurity, and SNAP can be a critical resource that provides stability as they navigate the adult world of work, training, and housing. As a result of H.R. 1, many individuals, including youth leaving foster care and youth experiencing homelessness, will be expected to meet work requirements and time limits in order to receive SNAP unless they meet specific exemptions. Your support and guidance can make a critical difference for transition-age youth who need SNAP to help maintain food security.

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### 1. Proactively Connect Transition-Age Youth With SNAP and Build Trust

- Ask if the youth is currently receiving or has recently lost SNAP benefits.
- Explain that SNAP helps them buy food and that losing benefits does not mean they did something wrong.
- Reassure young people that even though the law has changed, SNAP continues to be an important benefit for which they are likely to be eligible.
- Help the young adult ask for any accommodations they may need from the SNAP agency based on a disability.
- If the youth has aged out of foster care or is homeless, help them stay connected with a supportive adult or agency that can help with SNAP applications and renewals/recertifications.

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### 2. Provide Encouragement and Support

- Reassure the youth that needing SNAP is normal and that they have a right to ask for help.
  - Offer to attend meetings or interviews with them, or help them prepare.
  - Make sure they understand when to recertify and what documents they may need.
  - Connect them with local food pantries or emergency food programs if benefits are delayed or denied.
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### 3. Help Transition-Age Youth Understand the Basics of the New SNAP Requirements under H.R. 1

- Make sure young people know that the new law provides SNAP for only three months in a three-year period unless the individual: (1) qualifies for an exemption, (2) works for at least 80 hours per month (20 hours per week), including unpaid work, volunteering, a work experience, or workfare, or (3) participates in a state-run or approved work program or qualifying education or training (E&T) program. Help young people understand that having experience in foster care and/or homelessness is no longer an exemption from the work and time limit requirements.
  - Help young people understand the terms that their state uses and also how those terms can be misleading and hurtful. For example, the work and time limits requirement is often referred to as the ABAWD requirements or rules. ABAWD stands for “Able Bodied Adults Without Dependents.” One of the exemptions is referred to as “unfitness,” which is an outdated term, but may be used by your local SNAP office.
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### 4. Help Humanitarian Based Transition-Age Youth Who Are No Longer Eligible for SNAP Find Other Sources of Food Assistance

- Help transition-age youth who are humanitarian-based non-citizens understand that the new federal law, H.R. 1, may make them ineligible for SNAP. In addition to citizens, only individuals with the following statuses are eligible for SNAP: (1) “aliens lawfully admitted for permanent residence,” (i.e., green card holders or LPRs), (2) Cuban and Haitian entrants, and (3) those residing under a Compact of Free Association.<sup>1</sup> This means individuals who are asylees or refugees are no longer eligible for SNAP. Young people with Special Immigrant Juvenile Status (SIJS) who are awaiting their green cards continue to be ineligible for SNAP.
  - Help transition-age youth check to see if there is a state-funded food assistance program in your state for which they may be eligible.
  - Help identify food pantries, grants to purchase food, and if they are students, campus Basic Needs Centers.
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### 5. Check for Exemptions From Time Limits

- Help transition-age youth understand that there are exemptions from the time limits/work requirements.
- Help them determine whether they qualify for a SNAP exemption. They may be exempt if they are:
  - ◆ under 18 or age 65 or older,
  - ◆ considered an “Indian, Urban Indian, or California Indian”<sup>2</sup> under federal law,
  - ◆ physically or mentally unable to work (referred to as the “unfitness” exemption),
  - ◆ regularly participating in a program that treats addiction,
  - ◆ applying for or receiving disability or unemployment benefits,
  - ◆ pregnant,
  - ◆ a student enrolled at least half time in any recognized school, training program, or institution of higher education, or
  - ◆ part of a household with a child 14 or younger.<sup>3</sup>

- Ask about any medical, emotional, or trauma-related conditions, or if they are unable to meet basic food and shelter needs, that may make regular work difficult. These challenges may qualify applicants for the “unfitness” work exemption.
  - Help the youth complete any forms that are required to claim an exemption and/or collect any proof that supports their exemption, such as a doctor’s note, letter from a social worker, or case documentation from foster care or housing services.
  - Help the youth tell the agency if they have good cause for no longer meeting the 20 hour/week requirement (such as being sick, transportation problems, etc.).
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## 6. Advocate for Flexible Verification and Provide Verification if Possible

- Ask the agency to accept any reasonable proof — including a statement from a teacher, counselor, doctor, or social worker familiar with the youth’s situation.
    - ◆ Provide verification if possible. And if not, help the young person obtain verification from the appropriate person.
  - If the youth’s disability or trauma is visible or well-documented, remind staff that formal medical paperwork may not be necessary.
  - Request that the agency record all accommodations and exemptions in the case file to prevent future interruptions in benefits.
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## 7. Urge the SNAP Agency to Use Existing Information Before Gathering More

- Remind the SNAP worker that the state can often confirm a youth’s eligibility using existing records (from Medicaid, child welfare, housing programs, etc.).
  - If the agency already has documentation of homelessness, disability, or foster care involvement, the youth should not be asked to provide it again.
  - If the state needs more proof, help the youth gather it — and ask the agency to assist in obtaining verification, not place the full burden on the youth.
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## 8. Help Students Stay Connected to SNAP

- Help transition-age youth who are students more than half time at community college, four-year colleges, and certain other similar programs understand they may still be eligible for SNAP if they meet certain exemptions. If they attend less than half time or are in a program that is not considered an Institution of Higher Education, including short term certificate and vocational programs, they are not subject to the regular SNAP student requirements, but the education program will count as a time limit exemption.
- Make sure students are screened for eligibility and any potential student exemptions for which they may be eligible. Students may be eligible for a time limit exemption if they: (1) work an average of 80 hours per month; (2) care for a child in certain circumstances; (3) have a physical or mental health condition that limits their ability to work 80 hours a month; (4) are in school through a state-approved education or training program; (5) are engaged in certain other approved work or job readiness programs; or (6) are receiving TANF and in compliance with the work program rules.

- If the student has accommodations or receives support from a college disability office, help them request a letter verifying they have barriers to work due to a disability.
  - Help the student obtain other records or information that shows working while going to school would be very difficult.
  - Encourage the SNAP office to use plain-language questions, for example: “Do you have any physical or mental barriers that make working while in school difficult?”.
  - Help students identify any student support programs and Basic Needs Centers on campus that provide food and advocacy related to SNAP.
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## 9. Connect and Coordinate With State Agencies

- Partner with child welfare, housing, education, and workforce programs.
  - If the youth is still in extended foster care (ages 18–21 or older), confirm that this is noted in their SNAP case and that they are screened for all possible exemptions.
  - Connect transition-age youth with local legal service providers who can assist with challenges such as improper benefit terminations or reductions.
  - Encourage the youth to keep copies of any forms or letters they submit.
  - Ensure the young person keeps their contact information updated with the SNAP agency, including phone number, email address, and mailing address. If the young person does not have stable housing, find out whether an alternative address can be used for mail purposes.
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## Endnotes

<sup>1</sup> The Compact of Free Association (COFA) is an agreement between the U.S. and the Federated States of Micronesia, the Republic of the Marshall Islands, and the Republic of Palau. Individuals from these jurisdictions can live, work, and study in the U.S. without a visa.

<sup>2</sup> For more detail on these definitions, see: Food and Nutrition Service. *Supplemental Nutrition Assistance Program (SNAP) provisions of the One Big Beautiful Bill Act of 2025 — ABAWD exceptions — Implementation memorandum*. <https://www.fns.usda.gov/snap/obbb-ABAWD-exemptions-implementation-memo>

<sup>3</sup> 7 CFR §273.7(b) lists exemptions from the general work requirement (i.e. those who do not need to register). 7 CFR §273.24 (c) lists individuals to whom the time limit does not apply.