FRAC
Food Research & Action Center

H.R. 1: CHANGES TO SNAP TIME LIMITS

New Policies Impacting SNAP

The Supplemental Nutrition Assistance Program (SNAP) is the nation's first line of defense against hunger, providing monthly food assistance to over 42 million people in 2025.[1] Research demonstrates that SNAP alleviates hunger, improves nutrition and health outcomes, stimulates local economies, supports educational outcomes for children, and reduces long-term health care costs.[2]

After being passed by the majority of Republicans in Congress, President Trump signed the budget reconciliation bill, H.R. 1, into law on July 4, 2025.[3] The law enacts sweeping changes to SNAP that threaten the dignity, health, and well-being of millions of Americans struggling to put food on the table.

It significantly expands SNAP time limits. As a result, millions of adults — including caregivers, veterans, older workers, and people experiencing homelessness — face the loss of food assistance.

SNAP WORK REQUIREMENTS VS. ABAWD TIME LIMITS

SNAP operates under two distinct sets of participation requirements: general work requirements and time limits for Able-Bodied Adults Without Dependents (ABAWDs).

General Work Requirements

Most adults ages 16 to 59 who are physically and mentally able to work must:

- register for work
- accept suitable employment if offered
- participate in a state-assigned Employment and Training (E&T) program, if required
- avoid voluntarily quitting a job or reducing work hours below 30 per week without good cause[4]

ABAWD Time Limits

In addition to general work requirements, SNAP imposes a strict time limit on individuals classified as ABAWDs. Under this policy, individuals may receive SNAP benefits for only **three months within a three-year period** unless they document an average of at least 20 hours per week of work or participation in a qualifying activity, such as an E&T program or state workfare.[5]

States are not required to provide E&T or workfare slots, leaving many people with no realistic pathway to maintain eligibility, even when they are willing to comply.

Failure to meet the ABAWD work and documentation requirements results in the receipt of SNAP benefits being part of "countable months." After three countable months, individuals lose eligibility for SNAP for the remainder of the three-year period. Recipients can regain eligibility by meeting the work and documentation requirements.

Exemptions Prior to H.R. 1

Before July 2025, exemptions from the ABAWD time limit applied to individuals who were:

- under age 18 or over 54
- with verified disabilities
- pregnant people
- parents or caretakers of children under 18
- veterans
- individuals experiencing homelessness
- young adults under 25 who aged out of foster care

Congress added exemptions for veterans, young people aging out of foster care, and individuals experiencing homelessness, through the Fiscal Responsibility Act of 2023 in recognition of the substantial barriers these groups face in securing state employment.[6]

A Fundamental Shift in Who Is Subject to Time Limits

When Congress created the ABAWD time limit in 1996, it applied only to adults without dependents — specifically excluding parents and caregivers in recognition of their caregiving responsibilities.

H.R. 1 fundamentally breaks from that framework. **For the first time in SNAP's history, the law extends ABAWD-style time limits to people with dependents, including parents, grandparents, and other caregivers of children ages 14 and older**. This change redefines the concept of "ABAWD" and exposes families with active caregiving responsibilities to harsh benefit cutoffs that were never intended to apply to them.

KEY CHANGES UNDER H.R. 1

H.R. 1 makes sweeping changes to SNAP participation, by:

- increasing the upper age limit of those subject to time limits, from 54 to 64;
- eliminating recently added exemptions to the time limit for veterans, people experiencing homelessness, and youth aging out of foster care;
- subjecting parents, grandparents, and caregivers of children 14 and older to the time limits. Unless these individuals document at least 20 hours per week of work, secure a qualifying volunteer placement, participate in SNAP E&T or workfare, or qualify for a different exemption, they may receive SNAP for only three months in a three-year period.[7]

The Congressional Budget Office (CBO) projects that these restrictions will make 1.4 million people ineligible for SNAP on average each month.[8]

H.R. 1 strips food assistance from caregivers, older adults, veterans, and people already struggling to find steady employment. Research consistently shows that time limits do not increase employment; instead, they raise administrative barriers and sharply increase food insecurity, especially when states must implement complex changes on an accelerated timeline.

Waivers

The new regulations reduce the ability of states to seek waivers of ABAWD time limit requirements.

To reduce the harm caused by time limits, federal law historically allowed states to request waivers for areas with high unemployment or insufficient job availability. Before H.R. 1, states could receive a waiver if an area had an unemployment rate over 10 percent, or insufficient job opportunities for those subject to time limits.[9] These waivers typically lasted one year and were integral to state planning and budgeting.

H.R. 1 eliminated the "insufficient jobs" criterion, allowing waivers only where unemployment exceeds 10 percent. When H.R. 1 was enacted, about 20 states had active waivers, many extending into 2026. The CBO estimated that ending "insufficient jobs" waivers would cut off benefits for roughly 1 million people per month.

Though the law does not authorize the U.S. Department of Agriculture (USDA) to terminate existing waivers, it tried to do so anyway. In Rhode Island State Council of Churches et al. v. Rollins et al., a federal court found that USDA acted unlawfully by prematurely terminating state waivers in areas with insufficient jobs.[10] The ruling reaffirmed that states retain active, valid waivers and USDA must honor their scheduled expiration dates.

CURRENT EXEMPTIONS

People otherwise classified as ABAWDs are exempt from the three-month time limit if they:

- Live with a child under age 14.
- Take care of a child aged 6 or younger outside the home, such as caregiving for a grandchild, a neighbor's child, etc.
- Take care of a disabled adult or a disabled child (of any age).
- Are pregnant.
- Have earned income (before taxes) of $217.50 per week ($870/month), regardless of hours.
- Have applied for or are receiving Unemployment Insurance.
- Are in an education or training program.
- Have an impairment or disability that impacts the ability of the adult to work.
- Are participating in a substance use disorder treatment program.
- Are a member of a federally recognized Indian Tribe or nation.

ECONOMIC CONTEXT

Most of the people who rely on SNAP are working, but at jobs that provide low wages with unpredictable hours, few benefits, and limited opportunities to advance.[11] Expanding time limits will not create jobs or raise wages; it will simply take food away from people who are unable to find steady work in an economy that is failing to provide it.

Recent labor data underscore this reality. National hiring has fallen to its lowest level since 2009, when the U.S. economy was still recovering from the Great Recession,[12] and the share of people unemployed for more than 15 weeks — longer than the three-month time limit — has increased over the past year.[13] With job opportunities shrinking and competition for low-wage work intensifying, the policy's timing could not be more damaging — punishing people for economic conditions beyond their control.

A RECKLESS IMPLEMENTATION TIMELINE

The effective date for the changes to SNAP time limit rules was July 4, 2025, the day the budget reconciliation law was enacted. States were granted a 120-day hold-harmless period, where they would not be penalized for administrative errors as they adjusted to these new regulations. That period ended on November 1, 2025.

Implementation of the new time limit rules will not happen all at once. Because SNAP eligibility is determined during application, recertification, or interim reporting, the new time limit rules will be phased in gradually.

This means the impact on individuals may not be immediate — some participants will experience changes at their next recertification, while others may not be affected for several months. The speed and scope of implementation will depend on each state's administrative systems, staffing levels, and policy decisions.

However, the impact on state SNAP agencies began right away. States need to update data systems, staff training, and client communication materials. They also need to evaluate the impact of expanding time limits on their populations and modify other programs — like SNAP E&T — to prevent people from losing SNAP and address the fallout when people inevitably do. Because states were required to implement sweeping policy and system changes within an abbreviated timeline that overlapped with a federal government shutdown, they will almost certainly face increased administrative costs and payment error rates.

Advocates should coordinate with state agencies to understand the timeline of implementation and ensure clear, proactive communication with SNAP participants, so families are not blindsided by new requirements.

HOW TO REDUCE THE HARM

As the new time limits take effect, the stakes could not be higher. These policy changes will have severe consequences, weakening SNAP and cutting off individuals and families from essential food assistance for years to come. However, there are ways advocates can work to reduce harm and protect SNAP access.

1. **Protect people from time limits:** Work with state agencies to identify populations at risk: adults 18–64, caregivers of children 14 and older, veterans, youth aging out of foster care, and people experiencing homelessness. Connect them to community organizations and legal advocates now. Press state agencies to simplify exemption processes (i.e., for medical conditions, caregiving, unfitness for work, or treatment participation), train staff, and ensure outreach workers know how to assist people in documenting their eligibility. Also, work with community-based organizations to track these populations, and before they are cut off from benefits, help identify exemptions that harmed individuals may be eligible for.
2. **Track waiver expirations:** Many states currently have waivers for high unemployment or insufficient-job areas. Identify when your state's waivers are set to expire and press agencies to communicate clearly with SNAP participants. Advocates can also prepare public education campaigns so families are not blindsided when waivers end.
3. **Push to extend the hold-harmless period:** Work with your state legislature and Members of Congress to urge USDA to extend the hold-harmless period. States are already facing significant risk of elevated payment error rates due to limited administrative capacity, staffing shortages, and rapidly changing program requirements. At a minimum, states should be granted at least one year to fully implement these complex changes without penalty. USDA must also issue clear, detailed guidance on implementation timelines, reporting expectations, and when states will again be held accountable for quality control (QC) purposes.
4. **Partner with states to prevent permanent harm:** The man-made chaos of the October–November 2025 federal shutdown underscored just how pivotal SNAP is to the stability of our communities and state economies. During that crisis, many states acted decisively to minimize the harm caused by the Trump administration's inaction — demonstrating that when states are willing, they can be powerful partners in protecting residents from hunger.
5. **Encourage state legislators to strengthen food benefit programs:** Talk with your state legislators and remind them how the shutdown exposed the fragility of our food system — and the vital role states played in mitigating harm. Encourage them to take proactive steps now by creating state-funded food assistance programs or passing legislation to protect vulnerable groups from food insecurity such as caregivers, veterans, older adults, and people experiencing homelessness.
6. **Push congress to reverse SNAP cuts:** Urge your Members of Congress to cosponsor the Restoring Food Security for American Families and Farmers Act of 2025, introduced by Sen. Ben Ray Lujan (D-NM), Senate Agriculture Committee Ranking Member Amy Klobuchar (D-MN), Rep. Jahana Hayes (D-CT), and House Agriculture Committee Ranking Member Angie Craig (D-MN). This bill would repeal all SNAP cuts enacted by H.R. 1. Repealing these cuts is one of the most important steps to protect households already struggling with rising food and housing costs.

H.R. 1 POLICIES PUT THE PRESENT AND FUTURE OF SNAP IN JEOPARDY

H.R. 1 represents the largest retrenchment of SNAP in decades, dismantling proven protections that help millions of people with low incomes stay fed and stable. Expanding time limits while eliminating state flexibility will deepen hunger, strain state agencies, and destabilize local economies. Federal, state, and community partners must act now to protect families, uphold the integrity of SNAP, and prevent unnecessary harm.

ENDNOTES

1. United States Department of Agriculture. *Supplemental Nutrition Assistance Program participation and costs*. https://fns-prod.azureedge.us/sites/default/files/resource-files/snap-annualsummary-2.pdf **2.** Food Research & Action Center. *The role of the Supplemental Nutrition Assistance Program in improving health and well-being*. https://frac.org/wp-content/uploads/hunger-health-role-snap-improving-health-well-being.pdf **3.** H.R. 1, 119th Cong. (2025-2026). https://www.congress.gov/bill/119th-congress/house-bill/1/text **4.** 7 U.S.C. § 2015(d)(1) **5.** 7 U.S.C. § 2015(o)(2); 7 C.F.R. § 273.24(a) **6.** H.R. 3746, 118th Congress (2023-2024). https://www.congress.gov/bill/118th-congress/house-bill/3746/text **7.** SNAP Work Requirements, Food and Nutrition Service, U.S. Department of Agriculture, updated December 9, 2024. https://www.fns.usda.gov/snap/work-requirements **8.** Estimated Budgetary Effects of Public Law 119-21, to Provide for Reconciliation Pursuant to Title II of H. Con. Res. 14, Relative to CBO's January 2025 Baseline, Congressional Budget Office, July 21, 2025. https://www.cbo.gov/publication/61570 **9.** 7 U.S.C. § 2015(o)(4)(A) (2024) **10.** Rollins v. Rhode Island State Council of Churches, No. 25A539. (U.S. Nov. 7, 2025). orderofcourt_0.pdf **11.** USDA. *Characteristics of SNAP households: Fiscal year 2023*. https://www.fns.usda.gov/research/snap/characteristics-fy23 **12.** Cox, J. (2025, October 2). *Report shows hiring at lowest since 2009 as economists turn to alternative data during shutdown blackout*. CNBC. https://www.cnbc.com/2025/10/02/report-shows-hiring-at-lowest-since-2009-as-economists-turn-to-alternative-data-during-shutdown-blackout.html?msockid=2829fe08cf0663cb3858e895ce9162ec **13.** Bureau of Labor Statistics. *The employment situation — February 2026*. See Table A-12. https://www.bls.gov/news.release/pdf/empsit.pdf