

Streamlining the New SNAP Time Limit Exemption for People Experiencing Homelessness

By providing benefits to purchase food, the Supplemental Nutrition Assistance Program (SNAP) is vital to supporting the nutrition, health, and well-being of people experiencing homelessness. New temporary SNAP time limit exemptions went into effect September 1 — including for people experiencing homelessness — pursuant to the 2023 Fiscal Responsibility Act (FRA).¹

Ensuring that the time limit exemptions for the newly exempt people experiencing homelessness are implemented effectively is an important strategy to improve their access to SNAP.

About the SNAP Time Limit

Many adults without children or other dependents *can only* get SNAP benefits for three months in a 36-month period unless they are exempt or are able to document sufficient work hours. Some groups have been designated as exempt from the time limit.

Calling the SNAP time limit the “able-bodied adult without dependents (ABAWD) work requirements” is a misnomer, as a person’s willingness to work or conduct an active job search does not suffice to protect one against being cut off from SNAP. Instead, the SNAP time limit punishes people by taking food away for not documenting sufficient hours of work or for being exempt in theory but not deemed exempt in practice.

As of October 2023, the SNAP time limit age range was expanded to 18–52 years old. By October 1, 2024, the age range will expand further to include those 53 and 54 years old. (Prior to the changes in the FRA, the time limit applied to people ages 18–49).

Some adults who fall subject to the time limit have underlying mental and physical health problems that are difficult to document in the ways required to qualify for the exemption by the SNAP agency. Moreover, while many of the people subject to the time limit have connections to the labor market, they either cannot find jobs or get too few hours of work in the jobs they do have to meet the time limit threshold.

In September 2023, new temporary explicit exceptions to the SNAP time limit went into effect for people experiencing homelessness, veterans (regardless of the conditions of their discharge or release), and certain young people aging out of foster care.²

New exemption: A “homeless individual,” as defined in Section 3 of the Food and Nutrition Act (FNA) of 2008 and at 7 CFR 271.2, means an individual who lacks a fixed and regular nighttime residence or an individual whose primary nighttime residence is: (1) a supervised shelter designed to provide temporary accommodations (such as a welfare hotel or congregate shelter); (2) a halfway house or similar institution that provides temporary residence for individuals intended to be institutionalized; (3) a temporary accommodation for not more than 90 days in the residence of another individual; or (4) a place not designed for, or ordinarily used, as a regular sleeping accommodation for human beings (a hallway, a bus station, a lobby, or similar places). Note: This new exception is broader than chronic homelessness and includes individuals who lack a fixed and regular nighttime residence or whose primary nighttime residence is temporary.³

While newly exempt from the SNAP time limit, people experiencing homelessness still must meet all the other SNAP eligibility requirements to be eligible for a benefit.

Background: In 2022, more than 582,000 people⁴ faced homelessness on a single night in the U.S. Among them, 60 percent stayed in sheltered locations, and 40 percent stayed in unsheltered locations, such as on the streets, in abandoned buildings, or other places not fit for human habitation.⁵ About 30 percent of this population also had a disability during their extended periods of homelessness. In a given year, more than 1 million people face homelessness, with even more facing housing instability⁶ (e.g., trouble paying rent, overcrowding, or frequent moves) making them at risk for homelessness. Among this population, Black, Latinx,⁶ and Native Hawaiian and other Pacific Islanders are overrepresented. People experiencing homelessness face greater challenges in addressing basic needs, including those related to purchasing, preparing, and storing food. Despite many being eligible for SNAP, they face obstacles in connecting to benefits.

Effective implementation of the new exemptions should be paired with outreach to people who experience homelessness and are eligible for SNAP.

Connecting People Experiencing Homelessness to the Time Limit Exemption

Outreach: Spread the Word About SNAP and the SNAP Time Limit Exemption

Key steps:

- **Ensure that the state SNAP agency website has information about SNAP time limit rules and exemptions:** State SNAP agencies should publish clear and accessible information about the SNAP time limit rules and exemptions to the time limit rules. This information should align with U.S. Department of Agriculture Food and Nutrition Service (USDA-FNS) guidance and pay particular attention to the civil rights law responsibilities to serve persons with limited English proficiency and those with disabilities.

- **Ensure that community organizations that support people experiencing homelessness are at the table alongside SNAP state agencies and SNAP outreach partners in creating outreach plans and materials to promote this time limit exemption:** Work with a range of partners to create user-friendly, accurate messaging and develop strategies to reach people experiencing homelessness. Having engaged partners who know how to reach people who experience homelessness is vital to these efforts.
- **Communicate the broad definition of the term “homeless individual” but use people-centered language in outreach:** The definition of “homeless individual” often varies from program to program. Make sure that outreach materials about this new exemption include clear examples of who is a “homeless individual” under this broad regulatory definition (e.g., Are you living in a shelter? Are you living with someone temporarily? Are you sleeping outside? etc.).
- **Adopt people-centered language in outreach:** Avoid using terms like homeless person/individual in outreach materials that depersonalize individuals and carry discriminatory and negative connotations.⁷ Instead use people-centered terms like a person who is experiencing homelessness or a person who faces housing insecurity.
- **Share information about the SNAP time limit exemption and about other SNAP policies:** People who are experiencing homelessness may qualify for SNAP but face barriers such as inaccurate information. Locating documentation can be especially difficult for people who do not have housing, move frequently, and/or do not have a fixed address. Applicants do not have to have a fixed address, a mailing address, or a photo ID to apply for SNAP. While applicants will need to prove identity, there are many ways to do so, including an ID like a work or school badge, a health benefits card, an ID from another social service, a pay stub, a birth certificate, or a voter registration card. If a person experiencing homelessness does not have any documentation, the SNAP agency can also check their identity by calling shelter workers or an employer. For people without a fixed address, an applicant can elect to have SNAP notices mailed to a shelter (or other location), or appoint an authorized representative.

Screen: Properly Identify Those Eligible for the SNAP Time Limit Exemption

State SNAP agencies are tasked with properly identifying which applicants and participants are subject to the time limit. USDA-FNS has provided detailed guidance⁸ to states to ensure that those who are entitled to exemptions from the time limit by law do in fact get those exemptions in practice.

In implementing SNAP time limit exceptions, USDA has advised SNAP state agencies that they “are expected to only require verification of information that they determine is questionable. State agencies must follow their established guidelines for what is considered questionable. State agencies must support households in obtaining verification, provided the household is cooperating, and must accept any reasonable documentary evidence provided by the household. If documentary evidence cannot be obtained or is insufficient, the eligibility worker may use collateral contacts or home visits.”⁹

Key step:

- **The state agency should adopt self-attestation of a SNAP applicant’s homelessness status as allowed by guidance:**¹⁰ There are no new verification requirements to implement the new time limit exemption. Asking for verification of homelessness status can be embarrassing and even traumatic for people, and therefore, a barrier to application completion. Consistent with existing policy, a person’s statement that they are experiencing homelessness (e.g., living in a shelter, temporarily living with someone else, living outside, etc.) should be accepted as proof of meeting the definition of a “homeless individual” unless the agency determines it is questionable. If the agency deems the statement is questionable, SNAP caseworkers could verify through collateral contact with a homeless shelter, a person they are staying with, any other individual aware of the individual’s circumstances, or other means. In some instances, the agency may already have information on whether a household is experiencing homelessness if that information was used to provide a homeless shelter deduction.

Time Limit Exemptions Are Not Enough

Exemptions for certain groups are no guarantee that they will not be subject to the SNAP time limit in practice. Rather than create additional administrative burdens, the solution is to pass [The Improving Access to Nutrition Act \(H.R. 1510/ S. 2435\)](#) to end the SNAP time limit permanently.

There are also additional SNAP improvements needed beyond time limit exemptions for people experiencing homelessness — such as a less complicated application process, more targeted outreach, more robust application assistance, and adoption of state options such as the [Restaurant Meals Program](#). These are outside the scope of this brief.

Resources

Maintaining SNAP Benefits for Unemployed and Underemployed People Struggling in the Labor Market (FRAC July 2023): https://frac.org/wp-content/uploads/SNAP-Time-Limits_R3.pdf

People experiencing homelessness-specific FNS Guidance:

- [Implementing SNAP Provisions in the Fiscal Responsibility Act of 2023](#) — June 2023 (Verification — Page 3); July 2023 (Q 1, 18, 19); August 2023 (Q 4, 5, 6, 12)
- [USDA Food and Nutrition Service, SNAP Able-Bodied Adults Without Dependents \(ABAWD\) Policy Guide](#) — September 2023

Endnotes

¹ Fiscal Responsibility Act of 2023, Pub. L. No. 118-5 (2023).

<https://www.congress.gov/118/plaws/publ5/PLAW-118publ5.pdf>.

² Buhrig, C. (2023, June 30). *Implementing SNAP Provisions in the Fiscal Responsibility Act of 2023*. USDA Food and Nutrition Service. <https://fns-prod.azureedge.us/sites/default/files/resource-files/Fiscal-Responsibility-Act-of-2023-Implementation-Memo.pdf>.

³ Buhrig, C. (2023, July 27). *SNAP Provisions of the Fiscal Responsibility Act of 2023 — Questions and Answers*. USDA Food and Nutrition Service. <https://fns-prod.azureedge.us/sites/default/files/resource-files/SNAP-Provisions-of-the-Fiscal-Responsibility-Act-of-2023-Questions-and-Answers-1.pdf>.

⁴ de Sousa, T., et.al (2022, December). *The 2022 Annual Homelessness Assessment Report (AHAR) to Congress*. U.S. Department of Housing and Urban Development — Office of Community Planning and Development.

<https://www.huduser.gov/portal/sites/default/files/pdf/2022-AHAR-Part-1.pdf>.

⁵ Ibid.

⁶ U.S. Department of Health and Human Services. *Healthy People 2030 — Housing Instability*. <https://health.gov/healthypeople/priority-areas/social-determinants-health/literature-summaries/housing-instability>.

⁷ Braun, C. (2022, October 18). *Changing the Way We Talk About Homelessness*. The HomeMore Project. <https://thehomemoreproject.org/blog/changing-the-way-we-talk-about-homelessness>.

⁸ See Cathy Buhrig, “Implementing SNAP Provisions in the Fiscal Responsibility Act of 2023,” USDA, Jul 3, 2023, <https://fns-prod.azureedge.us/sites/default/files/resource-files/Fiscal-Responsibility-Act-of-2023-Implementation-Memo.pdf> (memorandum also gives examples of acceptable documentation to support a person’s status as homeless, a veteran or a young adult aging out of foster care).

⁹ Ibid.

¹⁰ Ibid.

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