

SNAP Access: Model Policies and Best Practices for Supporting Transition-Age Youth With Experience in Foster Care and/or Homelessness

Summary

This guide outlines model state policies and best practices for Supplemental Nutrition Assistance Program (SNAP) agencies that are responsive to the unique needs of transition-age youth (TAY)¹ who have experience in foster care and/or are homeless. It also highlights how community-based organizations, advocates, and partners can support transition-age youth who will be impacted by the SNAP work requirements implemented in November 2025 as the result of the passage of the budget reconciliation law, H.R. 1. States can mitigate the harm and promote access to SNAP by developing responsive policies and practices that: (1) exempt TAY when appropriate, (2) remove barriers to documenting and meeting the requirements, and (3) connect TAY to meaningful work experiences and training when needed.



- **"Foster care"** generally refers to any placement made by the child welfare agency where the agency retains responsibility for placement and care, including placements such as family foster care, kinship care, group care, and supervised independent living placements. Every year, roughly 15,000–20,000 young people age out of foster care without being reunified or legally connected to family. Many of these young people are at high risk for homelessness, economic hardship, and food insecurity.
- A **"homeless individual,"** as defined in Section 3 of the Food and Nutrition Act (FNA), 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). Often, adolescents and young adults experience homelessness as "couch surfing" and being doubled up with others, which may be hard to identify. It is estimated that one in 10, or 3.5 million, youth ages 18 to 25 experience homelessness a year.²
- **Supplemental Nutrition Assistance Program (SNAP)** is the nation's largest federal nutrition program and the first line of defense against hunger, helping 42.6 million people in the U.S. put food on the table.

Background

A. The Impact of the SNAP Provisions of H.R. 1 on Transition-Age Youth with Experience in Foster Care and Homelessness

The transition from adolescence to adulthood is a time of great change and development for young people as they make the challenging transition to the adult world of work, housing, and general responsibilities. Due to compounding challenges created by systems and policy failures, TAY are at high risk for food insecurity, with one in four transition-age youth experiencing food insecurity.³ The experience of food insecurity is even higher for young people in and leaving foster care, and youth experiencing homelessness. For example, researchers found that about 30 percent of young people in foster care were food insecure at ages 19, 21, and 23.⁴

While the need for SNAP and nutrition assistance is significant for TAY, young people transitioning from foster care and homeless youth face compounding barriers to stability —housing insecurity, trauma, interrupted education, and limited social supports — that make it difficult to meet SNAP's work requirements or complete the application process. Many of these young people are working, but often lack the work documentation, technology access, and consistent contact information that state agencies require for verification and follow-up.

Recognizing the compounding challenges that transition-age youth with experience in foster care and homeless youth face to stability and their well-being, Congress chose to exempt these young people from SNAP time limits under the Fiscal Responsibility Act of 2023. This year, H.R. 1 repealed these protections. As a result, these young adults who do not have children are now subject to SNAP's "Able-Bodied Adults Without Dependents (ABAWDs)" time limit and work requirements unless they qualify for an exemption, such as disability, medical unfitness, pregnancy, caregiving, or student status.

This policy change creates administrative burdens that are likely to lead to young people losing access to SNAP benefits, which could deepen food insecurity among a population already at risk. State policies and practices can help ensure that transition-age youth remain connected to critical resources, like SNAP, that they need to keep themselves safe and flourish as adults.



B. New SNAP Time Limits

Most adults ages 18 to 64 who do not live with children age 14 and under can receive SNAP benefits for *only* three months within a 36-month period *unless* they:

- work an average of 80 hours per month, or
- participate in a state-run or -approved work program for an average of 80 hours per month, or
- participate in any combination of working and participating in a work program for 80 hours per month, or
- participate in a workfare program, or
- qualify for an exemption under federal law or state policy.⁵

These new H.R. 1 requirements related to expanded time limits became effective on July 4, 2025, however their application will vary by state based on each state's certification schedule and operational readiness. Most individuals will be subject to the new requirements when they apply for SNAP, recertify, or submit an interim report after the effective date. In most states, ABAWD months will begin in December 2025. As a result, individuals who cannot document sufficient hours to meet the expanded time limits or qualify for an exemption are expected to begin losing eligibility and being removed from the program around March 2026.

As a result of H.R.1, having experience in foster care or being homeless is no longer an exemption from the time limits. While certain groups remain exempt from the time limit, such as pregnant individuals, caregivers, people with disabilities, and those medically certified as unfit for employment, many eligible individuals are at risk of losing benefits because their exemptions are not identified or properly documented/verified. This is especially true for young people with foster care experience and homeless youth, who may have underlying physical or mental health conditions, unstable housing, or gaps in documentation. Policies can be put in place to create clear paths so that these individuals can be identified for exemptions without barriers and burdensome documentation.

Model Policies and Best Practices

Effective implementation of model policies and best practices depends on robust and age-appropriate outreach, accurate screening, and trauma-informed engagement. States, local agencies, and community partners must work together to ensure that young adults transitioning out of foster care and homeless youth are not unfairly cut off from SNAP benefits simply because their eligibility for exemptions was overlooked or misunderstood. Below are recommended model policies and practices for SNAP agencies to promote effective implementation of the new policies that are responsive to the needs of TAY and will increase the odds that this vulnerable population appropriately maintains access to SNAP, and are food secure and connected to meaningful work and productive activities.



In the recommendations below, the term “agency” is used to refer to the state SNAP agency and “stakeholders” to include other agencies and community-based organizations that assist young people in accessing resources such as SNAP.

A. Provide Clarity on Who Is Exempt From the Time Limits

Some people do not have to meet SNAP's time limit or work requirements. These individuals are considered exempt. It is critical for SNAP agencies to make these exemptions clear and for community partners, caseworkers, and advocates to understand these categorical exemptions so that eligible people don't lose benefits by mistake. It is very likely that TAY, who may be a new applicant and may be confused by the change in exemptions, will be unaware of the current rules.

A person is exempt from the SNAP time limits if they meet any of the following:

- are under 18 years old or age 65 or older,
- are considered an “Indian, Urban Indian, or California Indian,”⁶

- are physically or mentally unable to work,
- are regularly participating in a program that treats addiction,
- are applying for or receiving disability benefits,
- are pregnant,
- are caring for, or are part of a household with, a child age 14 and under,⁷
- are a student enrolled at least half-time in any recognized school, training program, or institution of higher education

Agency Actions

- Provide information that is developmentally accessible and describes the exemptions with easily understandable examples.

Stakeholder Actions

- Help young people learn about the new program rules and key dates for their case, and to identify all organizations that can provide assistance with the application process.
- Prepare TAY to share information about their participation in workforce programs, or to document their employment, with their SNAP case worker.
- Help connect TAY with workforce programs.

B. Properly Identify Those Eligible for the SNAP Time Limit Exemptions for ABAWDs Through Skilled Screening

TAY with histories of abuse or neglect, system involvement, trauma, and homelessness are likely to be reluctant to share their history and experiences, including disabilities and exposure to violence, and may feel there is a stigma attached to system-involvement or their homelessness. This could create barriers for TAY to qualify for the exceptions laid out in 7 CFR § 273.24 (c)⁸ despite meeting the criteria.

State SNAP agencies are tasked with properly identifying which applicants and participants are subject to time limits. U.S. Department of Agriculture-Food and Nutrition Service (USDA-FNS) has provided detailed guidance 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.⁹

In implementing SNAP time limit exemption, 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.”¹⁰

Agency Actions

- Train caseworkers so that screening includes discussing with TAY their experience with what may be considered “trauma,” including experience in foster care and those experiencing homelessness, and any challenges or impairments that may lead to “unfitness for employment.”
- Train caseworkers to confirm a youth’s eligibility using existing records (Medicaid, child welfare, housing programs, etc.), if possible, and to assist youth in obtaining documentation if more is needed.

- Reinforce in policy that verification is needed only if the information presented is determined to be questionable. Attestations about experiences in foster care, homelessness, and other experiences are acceptable.
- In the event that further information is necessary, establish flexible verification policies, instructing staff to accept all reasonable proof, including a statement from a teacher, counselor, doctor, or social worker familiar with the youth's situation, and to record all accommodations and exemptions in the case file to prevent future interruptions in benefits.

Stakeholder Actions

- Help TAY understand the available exemptions and prepare them to raise eligibility for exemptions in their screening or recertification interview.
- Provide TAY with the policy that verification is not needed unless questionable so they can present it to the agency, if needed.
- Help TAY gather any documentation if needed to establish eligibility for an exemption.
- Provide certification of “unfitness” when appropriate.

C. Use the ‘Unfitness’ Exception to Protect Eligible Youth

States have discretion under 7 CFR § 273.24 (c)(2) to exempt individuals “unfit for employment” from the ABAWD work requirement. While TAY with experience in foster care and/or who are homeless want to be employed, often their circumstances create significant challenges to securing and maintaining stable employment. Further, finding employment while also struggling to meet basic needs, like food security, adds an additional stressor for youth that can impact their health and well-being in ways that prevent them from being able to achieve their employment goals. This is especially the case if they have experienced abuse or neglect, are still addressing the impacts of trauma, do not have a consistent support system, or do not have a stable place to live. Given that youth in foster care and homeless youth are disproportionately impacted by both trauma¹¹ and disability,¹² policies should require intentional screening of TAY in these two groups to accurately identify if they are exempt from the time limits due to “unfitness.”

Agency Actions

- Align definitions of “unfitness” with those used in Temporary Assistance for Needy Families (TANF) and provide clear guidance to caseworkers.
- Create policies that recognize trauma and mental health conditions as exemptions from work requirements and time limits.
- Create screening questions regarding whether a TAY has current or former experience in foster care.
- Create protocols that require intentional screening for TAY with experience in foster care and homelessness.
- Create policies that permit the following people to sign a certification of “unfitness” for TAY with experience in foster care and homelessness: a social worker, case aid, designated representative within these systems, or any other social service provider whose services may be reimbursable by Title IV-E in addition to physicians, nurse practitioners, psychologists, social workers, substance use counselors, or other licensed professionals reimbursable by Medicaid.
- Train SNAP staff to identify indicators of “unfitness,” including histories of homelessness and difficulty meeting daily needs, institutional care, exposure to violence, or trauma, and to apply the exemption appropriately.

Stakeholder Actions

- Help TAY understand available exemptions, including the “unfitness” exemption.
- Prepare TAY to share information about a disability, challenges or circumstances that make current employment untenable.

D. Identify Youth in Extended Foster Care (EFC) to Aid in Screening for Meeting the Work Requirements or Exemptions¹³

Extended foster care (EFC) is foster care that lasts past age 18. Almost all states have some extended foster care program, with most receiving federal Title IV-E funds and others are state-funded programs. Based on living situation and income, some young people in EFC may be eligible for SNAP. In almost all states, young people engage in activities like work, school, or training, or must have a disability that prevents them from engaging in these activities, to be eligible for EFC. For that reason, many of these young people are likely to meet the SNAP time limits, be exempt due to a disability, or enrolled at least part-time in postsecondary programs.

Agency Actions

- Coordinate with the state child welfare agency to develop policies that acknowledge the eligibility requirements for EFC in your state and whether they meet the SNAP work requirements or any exemptions.
- Develop protocols to do an intentional screening of young people in EFC to determine if they meet the work requirements based on their EFC activities or are exempt due to a disability.

Stakeholder Actions

- Prepare TAY to explain the activities they are doing in EFC when they are screened for SNAP.
- If a youth in EFC is incapable of meeting the school or work requirements of EFC based on a disability, help them share that information with the SNAP office/screener.

E. Support SNAP Access for TAY Through Identifying Participation in ‘Work Programs,’ Including Programs Targeted at TAY

An individual can meet the work requirements by participating in a work program for 80 hours a month.¹⁴ In addition to workforce programs targeted at all adults, there are workforce and job readiness programs that meet the definition of “work program” under 7 CFR § 273.24 (a)(3), but may be less familiar to SNAP office staff and program administrators. Many of these programs are very effective at engaging TAY and connecting them with stable employment. States should ensure that youth workforce and education programs count toward SNAP’s work requirement.

Agency Actions

- Create and maintain a centralized statewide list of programs that meet the definition of a “work program” under 7 CFR § 273.24 (a)(3), including: Job Corps, AmeriCorps, and Workforce Innovation and Opportunity Act (WIOA) funded programs, apprenticeships, state-funded youth workforce or employment partnerships, and career and technical education programs designed to improve employability. As soon as a new program is approved for an individual, it should be added to the list and considered an approved program for future applicants.
- Create relationships with youth/TAY workforce programs and have the capacity to refer TAY to them.

Stakeholder Actions

- Help TAY understand the available exemptions and prepare them to raise eligibility for exemptions in their screening or recertification interview.
- Help TAY gather any documentation if needed to establish eligibility for an exemption.

F. Protect Students Pursuing Postsecondary Education and Training by Clarifying all the Ways Students Can Meet the Requirement

Many TAY with foster care experience and/or who are homeless pursue postsecondary education and training as a pathway to stability and self-sufficiency. Often, they are facing extreme financial hardship and pressure to meet their needs without the benefit of a support network.

Under SNAP's current rules, students enrolled at least half-time are generally ineligible for benefits unless they meet one of the student exemptions under 7 CFR §273.5(b) — such as working 20 hours per week, participating in work-study, caring for a child in certain situations, are enrolled in a SNAP Education and Training program (E&T), are enrolled in certain programs run by the state for individuals with low income that improve employability and have elements of SNAP E&T programs, and those qualifying as physically or mentally unfit for employment while also attending school. Many TAY students meet these various requirements, but are not aware of all of them. In addition, some SNAP agencies may not be aware of qualifying programs under 7 CFR § 273.5 (b)(11)(iv) that target TAY rather than just "adult" programs. The result is that many TAY students do not receive SNAP even though they may be eligible.

Agency Actions

- Maintain a list of local programs that meet the student exemption. Develop a policy that once the state agency approves a program, it is automatically added to the statewide list and considered "approved" for all future applicants.
- Develop a policy that attendance at a state-run community college program meets the student work requirement pursuant to 7 CFR § 273.5 (b)(11)(iv) because these institutions provide programming that improves employability and serves many individuals with low income.
- Develop a policy that TAY who are students and in extended foster care should receive additional screening to determine whether they are meeting the student exemptions based on the activities already required for extended foster care.

Stakeholder Actions

- Collaborate with the state agency to develop an accurate list of work programs targeted at TAY.
- Help TAY get connected with work programs and prepare to share this information at their SNAP screening or recertification interview.

G. Protect Students Pursuing Postsecondary Education and Training Through the 'Unfitness' Exemption

As noted above, meeting the student exemptions can create significant hardship, especially for those with trauma histories, learning disabilities, or physical and mental health conditions. Many students leaving or in foster care also face unstable housing, limited family support, and chronic stress that make full-time work alongside schooling unrealistic.

The “unfitness” for work activities exemption is applicable to students. Students would need to show that they would not be able to do their school program, alone or in combination with other work or training to meet the requirements. Effective policies should help youth understand this exemption in the student context and provide concrete examples of what “unfitness” means for the student exemption.¹⁵

Agency Actions

- Develop policies that allow students to establish “unfitness” if they are receiving academic accommodations or support from a college’s disability access office.
- Clarify in policy that students do not need to receive formal disability benefits to be considered unfit.
- Create a policy that students can be considered unfit if they are experiencing chronic homelessness or enrolled in higher education through a vocational rehabilitation program.
- Develop protocols and provide training and coaching so that SNAP screeners are skilled at interviewing applicants in ways that are trauma informed related to disability and trauma histories that may not be visible. Plain-language screening questions include asking whether the student faces physical, emotional, or mental barriers to working while attending school instead of asking if a student is “unfit.”
- Collaborate with colleges and training programs to establish clear referral and verification pathways for identifying qualifying students.
- Develop policies to ease the burden of documentation,¹⁶ including:
 - ◆ Allowing caseworkers to self-attest to a young person’s disability (considered “obvious”).
 - ◆ If the disability is not obvious, allow verification from: a physician, nurse practitioner, psychologist, social worker, or mental health professional; a statement from a college’s disability or accommodations office; or a collateral contact such as a caseworker, social service provider, or counselor familiar with the student’s circumstances.
 - ◆ Develop protocols that detail actions caseworkers should take to assist applicants in securing verification when needed.
 - ◆ Once an individual is certified as “unfit,” do not require additional certifications.

Stakeholder Actions

- Help TAY understand the student requirements and exemptions.
- Help TAY prepare to provide information to the SNAP office about how they are meeting the student requirements.

H. Use Existing Information Before Asking for More

Young people with experience in foster care are connected with many systems, including Medicaid. Information used to validate eligibility for other programs including Medicaid, Temporary Assistance for Needy Families (TANF), or housing support can often be used to confirm their SNAP exemption. Federal rules (7 CFR § 273.24(l)) make clear that before asking an applicant for more paperwork or verifications, state agencies must exhaust all information available in their own systems or through existing data-sharing agreements. This helps prevent unnecessary barriers and keeps people from losing benefits simply because they are asked to provide documents the state already has.

State agencies are not required to create new data-sharing agreements, but they are strongly encouraged to work with other public programs to share information safely and effectively. Better coordination across systems — such as child welfare, housing, and Medicaid — helps agencies confirm exemption status quickly, reduce red tape, and make sure people keep the benefits they're eligible for. Data sharing should be limited to confirming eligibility for services and not shared for other purposes.

Agency Actions

- Create policies that require the agency to check data sources they have access to when verifying whether someone qualifies for a SNAP exemption such as having a disability, being pregnant, or meeting another exception before asking for documentation.
- Use data-sharing tools and case information from other public programs while ensuring data privacy and protections for young people.
- Develop specific protocols caseworkers should follow to assist applicants directly if verification is needed, rather than putting the burden entirely on the individual.

Stakeholder Actions

- Help TAY understand and enforce their rights related to policies on verification.

I. Conduct Targeted Outreach and Training

Many TAY, especially those who are coming from foster care or are homeless, are not aware of all the requirements of the SNAP program. In addition, due to recent changes in law related to the previous exemption of youth with experience in foster care and homelessness from the work requirement, there is also likely to be a good deal of confusion among TAY and stakeholders. Targeted outreach and developmentally appropriate communications will be critical to keeping eligible TAY connected to SNAP.

Agency Actions

- Collaborate with TAY to develop youth/young adult-centered materials explaining work requirement rules, exemptions, and application steps in plain language.
- Train SNAP and partner agency staff on trauma-informed engagement, confidentiality, and people-first language (e.g., “young people with experience in foster care”).
- Partner with child welfare and community organizations to create an outreach plan to share information with relevant community stakeholders and agencies. Here is an example of the [types of entities](#) that agencies should consider contacting.

Stakeholder Actions

- Help the state agency design age-appropriate and engaging communications materials.
- Assist the state in engaging TAY to create and provide feedback on materials developed.
- Work with the state agency to develop training for TAY.

Review the [Advocate's Checklist](#) for a step-by-step guide to helping transition-age youth keep their SNAP benefits.

Federal Policy Recommendation

While states can use these best practices to mitigate harm, the removal of the exemptions for individuals with experience in foster care and homelessness under H.R. 1 will inevitably increase hardship and administrative burden. Congress should restore and improve exemptions for youth with foster care experience and strengthen data-sharing and screening requirements to ensure equitable access to nutrition assistance.

Legal Citations for Key SNAP Provisions

[7 CFR § 273.7](#): general work requirement applicable to all SNAP households

[7 CFR § 273.24](#): time limits for ABAWDs

[7 CFR § 273.24](#) (c): exceptions to the ABAWD time limit

[7 CFR § 273.5](#): student eligibility requirements

[7 CFR § 273.5](#) (b): exemptions from the student work requirements.



Recommended research citation: Plata-Nino, G. & Pokempner, J. *SNAP access: Model policies and best practices for supporting transition-age youth with experience in foster care and/or homelessness.* <https://frac.org/wp-content/uploads/SNAP-Access-Foster-Care-Homelessness.pdf>

Endnotes

¹ Transition-age youth, or TAY, are young adults who are between the ages of 18 and 26.

² See *Missed opportunities: Youth homelessness in America—National estimates*. (Chapin Hall 2017).

³ Larson, N., et al. (September 2020). Food insecurity, diet quality, home food availability, and health risk behaviors among emerging adults: Findings from the EAT 2010–2018 study. *American Journal of Public Health*. <https://ajph.aphapublications.org/doi/abs/10.2105/AJPH.2020.305783>

⁴ *Food insecurity among transition-age youth exiting foster care*. Transition Aged Youth Research and Evaluation Hub 2024. https://ccwip.berkeley.edu/tay/articles-memos/TAY-Hub - Economic Food Insecurity 5-14-24_Final.pdf

⁵ 7 CFR § 273.24 (a)(1).

⁶ 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>

⁷ Other exemptions include: applying for or receiving unemployment benefits and earning at least \$217.50/week (\$870 month, averaged). All exemptions can be found at 7 CFR § 273.7 (general work provisions).

⁸ See 7 CFR § 273.24 (c). The time limit does not apply individuals who are: (1) under age 18 or age 55 or older; (2) determined by the State agency to be medically certified as physically or mentally unfit for employment; (3) a parent or household member who is responsible for the care a child who is under age 14; (4) pregnant; or (5) are an Indian, Urban Indian, or Californian Indian as defined by federal law.

⁹ *Implementing SNAP provisions in the Fiscal Responsibility Act of 2023*. June 30, 2023. While some of the exemptions noted in this guidance are no longer in place, the procedures around screaming for exemptions generally still apply. <https://fns-prod.azureedge.us/sites/default/files/resource-files/Fiscal-Responsibility-Act-of-2023-Implementation-Memo.pdf>

¹⁰ *Id* at at 3.

¹¹ See e.g. Salazar, A.M., et al. (2012 Aug 17). Trauma exposure and PTSD among older adolescents in foster care. *Soc Psychiatry Epidemiol*; 48(4):545–551 (“youth in foster care are a highly traumatized population and meet diagnostic criteria for PTSD at higher rates than general youth populations. For youth aging out of care, the ongoing impact of trauma may be particularly problematic given their sudden transition from intense system dependence to rugged independence, a challenge not typically expected of youth in the general population. Approximately 30% of respondents in the current study reported experiencing their worst trauma at or after age 16.”). <https://pmc.ncbi.nlm.nih.gov/articles/PMC4114143>

¹² See Slayter, E. (May 2016). Youth with disabilities in the United States child welfare system. *Children and Youth Services Review*, Volume 64, Pages 155-165. <https://www.sciencedirect.com/science/article/abs/pii/S0190740916300834>

¹³ Note that the exemption that was repealed through H.R. 1 was targeted at all individuals age 24 and younger with experience in foster care. This recommendation is limited to young people in extended foster care and therefore not at odds with the new law.

¹⁴ 7 CFR § 273.24 (a)(1)(ii).

¹⁵ States have explicit discretion under 7 CFR §273.5(b)(2) to define what constitutes physical or mental unfitness for students.

¹⁶ SNAP agencies must accept any reasonable documentary evidence as required under 7 CFR §273.2(f)(5)(i).