

H.R. 1: SNAP TIME LIMITS — AVOIDING BENEFIT LOSS THROUGH THE COMMUNITY SERVICE OR VOLUNTEER OPTION

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 37 million people as of April 2026.¹ 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

Many SNAP participants are subject to a three-month time limit on SNAP every three years, weakening the ability of the program to reduce hunger and improve well-being. Able-Bodied Adults Without Dependents, or ABAWDS, must document 80 hours of work a month to remain eligible for SNAP without time limits. However, federal [regulations](#) allow individuals subject to the time limit to meet their 80-hour requirement by “working-for-food” and volunteering at a state-approved nonprofit or public agency.

Congress created the Food Stamp Act of 1964 to establish a federal-state partnership that would improve nutrition and reduce hunger among low-income households by increasing their purchasing power for food.³ That purpose remains unchanged today. The Food and Nutrition Act declares that SNAP exists “to alleviate ... hunger and malnutrition” by enabling eligible households to obtain “a more nutritious diet ... through normal channels of trade by increasing food purchasing power for all eligible households who apply for participation” and “to promote the general welfare [and] safeguard the health and well-being of the Nation’s population by raising levels of nutrition among low-income households.”⁴

The ABAWD time limit and its volunteer provision shift the program away from its core mission by making food assistance contingent on unpaid community service rather than on the program’s primary objective of reducing hunger. While volunteering provides meaningful benefits to communities when it is voluntary, requiring it to maintain nutrition assistance does not advance the statutory purpose of SNAP and is distinct from the workforce development goals Congress established through SNAP Employment and Training (SNAP E&T), which is designed to help participants build skills, obtain employment, and achieve greater economic self-sufficiency.

Volunteering is not as simple or beneficial as it may sound. The volunteer provision is underfunded and under-supported, and creates strain for SNAP agencies, burdens for nonprofits, and challenges for SNAP participants.

SYSTEM STRAIN ON STATE AGENCIES

Volunteer-for-food programs are an additional component of SNAP operations that place strain on SNAP agencies. States are not required to operate volunteer programs, and community service placements are not part of a state’s SNAP E&T program. This means:

- ▶ **Lack of funding:** No dedicated federal funding or staff exist to recruit, verify, or oversee volunteer sites. States must absorb the entire cost of these operations and develop processes without support from the U.S. Department of Agriculture (USDA).
- ▶ **No budget for supports:** Unlike with SNAP E&T, state agencies have no funding for support services to participants, such as transportation reimbursement, stipends, or other volunteer work supports.
- ▶ **Additional tracking and verification burdens:** State agencies must develop protocols and processes for tracking community service participation. Caseworkers must review documents and verify hours for individuals subject to time limits, significantly increasing administrative costs and pulling caseworkers away from urgent tasks, like timely application processing.
- ▶ **Need for coordination:** State SNAP agencies must coordinate with nonprofits, many of which lack the infrastructure to host or supervise mandated volunteers. This adds workload without additional resources.
- ▶ **Limited federal guidance:** USDA has provided little to no guidance on what constitutes acceptable volunteer activities and documentation. As a result, states must develop their own policies for verifying unpaid volunteer work, creating uncertainty and increasing the risk of inconsistent federal oversight or changing compliance expectations.

BURDENS ON NONPROFITS

Nonprofits asked to host time-limited SNAP participants face multiple challenges taking on new volunteers, training them, and documenting their participation.

- ▶ **Resource demands:** Many community organizations operate on a shoestring budget with minimal staff. Adding volunteer training and supervision and providing supplies will strain their already limited resources.
- ▶ **Compliance burdens:** To take on ABAWDs who volunteer to avoid benefit loss, organizations will be required to complete state paperwork, track volunteer hours, and report absences that may trigger benefit loss.
- ▶ **Legal barriers:** Organizations that serve children, seniors, or people with disabilities must run criminal and sex-offender background checks for volunteers and meet liability standards, which can be invasive for volunteers and prevent their participation.
- ▶ **Capacity limits:** Many nonprofits reduced or eliminated casual volunteer roles after the COVID-19 pandemic. Small food pantries, often run by older volunteers, lack the staff or systems to manage placements and are often open for limited hours only a few days of the week. Accepting volunteers takes work and planning — small organizations can't effortlessly take on unpaid ABAWD labor. These burdens divert nonprofits from their mission and can damage trust with the very communities they serve.

BARRIERS FOR PARTICIPANTS

Community service is not an equal option for all SNAP participants. Barriers include:

- ▶ **Distraction from job search:** The three-month time limit on SNAP is too short for those who are unemployed and seeking work. The share of people unemployed long term — 27 weeks or more, longer than the three-month time limit — has increased over the past year.⁵ SNAP participants looking for work should not feel pressured to spend time volunteering when they could be searching for jobs and building their professional networks.
- ▶ **Limited workforce development:** The volunteer option is designed to satisfy an eligibility requirement, not to prepare participants for secure, stable employment. Unlike SNAP E&T programs, which provide education, occupational training, work-based learning, career pathways, and other evidence-based services to improve employability, volunteer placements are generally not structured to develop marketable skills, provide industry-recognized credentials, or connect participants to sustained employment opportunities. As a result, participants may spend valuable time meeting an



COMPLEX CALCULATIONS

Many — but not all — states use the “workfare” calculation to determine the number of volunteer work hours required for a household. This calculation is the value of the household’s monthly SNAP benefit divided by the state’s minimum wage. For instance, if a household receives \$232 in SNAP a month, they would have to document 32 hours of volunteer work in Alabama, where the minimum wage is \$7.25/hour, but only 13.6 hours in New York City where the minimum wage is \$17/hour. The hours can be divided among all ABAWDs in the household. The variation in mandated hours for different SNAP recipients makes tracking and verifying required hours complicated and burdensome.

Not all states use the workfare calculation for volunteer work. Some states require that all volunteers document 80 hours each month, and some states only allow the workfare calculation if the participant is enrolled in SNAP E&T.

administrative requirement rather than engaging in activities that strengthen their long-term economic mobility.

- ▶ **Finding placements:** In most states, participants must secure their own placement and provide documentation that the volunteer site meets agency requirements. Access to volunteer opportunities are deeply inequitable; rural and remote communities are routinely excluded, as most volunteer programs are concentrated in urban areas. The farther communities are from city centers, the fewer opportunities and resources are available, reinforcing geographic disparities.
- ▶ **Lack of USDA guidance:** Access and opportunities vary across the country due to a lack of uniform guidance. Complex or inconsistent documentation requirements may make it harder for eligible SNAP participants to verify compliance, increasing the risk of unnecessary benefit loss.
- ▶ **Tracking hours:** Participants must track their volunteer hours without the benefits of documentation like pay stubs. Further, the formula for the required number of hours is confusing (see box), and the onus is on participants to make sure they are meeting their minimums.
- ▶ **Transportation:** Many SNAP participants, particularly those in rural and remote areas, may need to travel long distances to reach volunteer sites without assistance or funding for transportation, gas or car repairs or access to public transit. Urban participants may lack funds for public transit, making it difficult to meet volunteer requirements.

- ▶ **Technology gaps:** Finding volunteer placements may require participants to use online portals, and virtual volunteering assumes access to broadband, laptops, or smartphones — resources many households lack.
- ▶ **Lack of options or enough hours:** Post-pandemic, many nonprofits eliminated casual or drop-in volunteer roles. Even where volunteer options are available, a single organization may not have enough hours available for a participant to meet their requirements at one place.
- ▶ **Privacy and legal restrictions:** Volunteer positions with children, older adults, or people with disabilities require criminal and sex-offender checks, which can be invasive for participants and limit their participation. Some states may charge for these background checks, which add costs that participants and organizations can't easily absorb.
- ▶ **Unpaid caregiving and volunteer work people already do may not count:** Caring for grandchildren, helping neighbors carry groceries, or picking up litter in your neighborhood are valuable ways that SNAP participants contribute to their communities, but are not easily documented or verifiable.

STRATEGIES FOR REDUCING HARM

Despite these reasons why the volunteer option is more challenging than it may seem at first, it remains a possible way for ABAWDs to maintain their SNAP benefits during periods of unemployment. State agencies and advocates should consider the following ways to make sure the volunteer option best serves participants who could benefit from it:

- ▶ **Screen for exemptions:** Many individuals classified as ABAWDs may qualify for an exemption but are never properly identified. For example, nearly one in two people with disabilities are misclassified and subsequently lose SNAP benefits. Properly screening individuals for exemptions is critical to preventing wrongful benefit loss and ensuring eligible participants retain access to nutrition assistance.
- ▶ **Expand SNAP E&T program options:** Career training and skill-building programs are a better option than volunteering, allowing participants to strategically and thoughtfully advance their careers. Expanding access to high-quality SNAP E&T, education, apprenticeships, and

other workforce development opportunities is a more effective approach to helping participants achieve lasting self-sufficiency.

- ▶ **Communicate with SNAP participants:** Make it clear that the volunteer option is available and be specific about what type of work is allowed, how participants can find volunteer placements, and what they must do to document their hours. State agencies should tell participants exactly how many volunteer hours they need to complete based on their households' SNAP benefit amount. Encourage participants to identify ways that they may already be completing volunteer hours through their churches, children's schools, or peer-to-peer interactions in their community.
- ▶ **Create systems for tracking hours:** Take the burden off participants by creating easy-to-use templates for tracking hours, and clear systems for submitting these records to the SNAP agency.
- ▶ **Recruit nonprofits and community organizations:** Participants may experience challenges finding volunteer positions that work for their needs and provide enough hours. States, cities, and advocacy groups should do some of this legwork by reaching out to organizations and identifying available volunteer slots.
- ▶ **Employ navigators:** Hiring dedicated staff to liaise with nonprofits and connect potential volunteers to appropriate positions can streamline the process for organizations and participants.
- ▶ **Push for city and state funding for stipends:** Being able to provide volunteers with stipends for transportation, supplies, or clothing can put the volunteer option within reach of people who would otherwise be excluded.

Volunteer work strengthens communities, but it should remain voluntary, not a prerequisite for accessing food assistance. The ability to volunteer often depends on having the time, transportation, and financial resources to do so. Many SNAP participants simply cannot afford to substitute unpaid labor for paid work or other essential responsibilities, making mandatory volunteer requirements an inequitable condition for receiving nutrition assistance.

ENDNOTES

1. United States Department of Agriculture, Food and Nutrition Administration. SNAP Data Tables. <https://www.fna.usda.gov/pd/supplemental-nutrition-assistance-program-snap>
2. Food Research & Action Center. (2017). *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. Pub. L. No. 88-525, 78 Stat. 703 (1964)
4. Pub. L. No. 110-246, §§ 4001–02, 122 Stat. 1853 (2008); 7 U.S.C. § 2011
5. Bureau of Labor Statistics. (2026). *The employment situation — June 2026*. <https://www.bls.gov/news.release/pdf/empisit.pdf>. (Accessed July 10, 2026).