



## Streamlining Veterans New SNAP Time Limit Exemption

By providing benefits to purchase food, the Supplemental Nutrition Assistance Program (SNAP) is vital to supporting the nutrition, health, and well-being of military veterans. New temporary SNAP time limit exemptions<sup>1</sup> went into effect September 1, including for veterans (e.g., people with military experience regardless of the conditions of their discharge or release) pursuant to the 2023 Fiscal Responsibility Act (FRA).<sup>2</sup>

Ensuring that the time limit exemptions for the newly exempt are implemented effectively is an important strategy to improve veterans' access to SNAP.

### About the SNAP Time Limit

Many adults without 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 “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 increase to also subject those who are 53 and 54 years of age to the time limit. (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 exceptions to the SNAP time limit went into effect for people who are experiencing homelessness, veterans/people with military experience, and certain young people with foster care experience.

**New exemption:** Veterans are newly exempt from the SNAP time limit if they meet the following definition, pursuant to Sec 5126(f)(13)(F) of the James M. Inhofe National Defense Authorization Act of 2023: “an individual who served in the United States Armed Forces (such as Army, Marine Corps, Navy, Air Force, Space Force, Coast Guard, and National Guard), including an individual who served in a reserve component of the Armed Forces, and who was discharged or released therefrom, **regardless of the conditions of such discharge or release** [emphasis added].”

While newly exempt from SNAP time limits, veterans still must meet all of the other SNAP eligibility requirements to be eligible for a benefit.

**Background:** Food insecurity among veterans is associated with higher rates of depression, suicide, and homelessness. About 7.5 percent of all veterans — nearly 1.4 million — are food insecure.<sup>3</sup> According to a U.S. Department of Agriculture (USDA) Economic Research Service report, from 2015 to 2019, about 11.1 percent of working-age veterans (ages 18–64) lived in food-insecure households.<sup>4</sup> Of these veterans, 5.3 percent lived in households with very low food security, meaning that some household members experienced reduced food intake and disrupted normal eating patterns due to limited resources.<sup>5</sup> This report found that working-age veterans’ risk of food insecurity was 7.4 percent higher than that of nonveterans.<sup>6</sup> Veterans with low incomes, veterans of color, and women veterans experience disproportionately high rates of food insecurity among veteran populations.<sup>7</sup>

About 1.2 million veterans participate in SNAP.<sup>8</sup> Yet, despite the prevalence of food insecurity among veterans, a “SNAP gap” exists with too many eligible veterans not accessing SNAP. A recent RAND Corporation study found veterans who were food insecure were consistently less likely than their nonveteran peers to be enrolled in the Supplemental Nutrition Assistance Program.<sup>9</sup>

## Implementing the Time Limit Exemption

### *Outreach to Spread the Word About the SNAP Time Limit Exemption — Key Steps*

- **Ensure that the state SNAP agency website has information about SNAP time limit rules and exemptions for veterans:** 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.
- **Communicate the broad definition of the term “veteran”:** The term “veteran” often varies from program to program. Many individuals who are considered a “veteran” under the SNAP time limit definition do not necessarily self-identify as veterans. This includes people with short, non-combat, or U.S.-based service; people who have been harmed by military culture (e.g., military sexual trauma, discrimination based on sexual orientation or gender identity); and those with a “bad paper discharge” (e.g., less than honorable conditions). It is therefore important to avoid the exclusive use of the term veteran to ensure that individuals who have had any experience in the military are accurately included in the new time limit exemption.

Questions that can more accurately identify all veterans eligible for the exemption include: “Have you ever been in the military?” or “Have you ever received military training?”

- Partner and collaborate with local veteran service agencies and organizations to spread the word:** Reaching out to organizations that veterans trust and rely on for support is a winning strategy to get the word out about time limit exceptions. The House Committee on Veterans Affairs has a list of veteran serving organizations at: <https://veterans.house.gov/resources-for-veterans/veterans-service-organizations>. Additionally, backed by the Veteran Office of Food Security, VA health centers are screening veterans for food insecurity and referring veterans to programs like SNAP. Consider partnering by hosting a webinar, creating tailored materials, or training staff that provide social services to veterans on SNAP.
- Help reduce the stigma that impedes veteran access to SNAP.** Military culture focuses heavily on self-sufficiency and views “need” as a weakness, which may explain low SNAP participation rates among veterans and other people with military experience. Talking about the exemption to the SNAP time limit for veterans provides an opportunity to reduce stigma around accessing SNAP, for instance, framing remarks around how SNAP is there to serve people who served their country; how the government is here to help people in times of need and millions in every community receive assistance from SNAP to help put food on the table; or how SNAP is a program that veterans access and that it even has special rules such as time limit exemptions to better serve veterans.

*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 guidance<sup>10</sup> 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.”<sup>11</sup>

Key steps:

- Self-attestation of being a veteran is sufficient and verification should only be requested if the information is questionable:** A person’s statement that they are a veteran should be accepted as proof unless the agency determines it is questionable. State agencies should adopt policies establishing self-attestation as standard for verification of eligibility for this exception.

If verification is necessary, ensure that the state SNAP agency provides several options for verifying past military experience. This can alleviate applicants' administrative burdens and the stress of securing specific documentation.

Forms of documentation that states could accept include but are not limited to:

- Service Department Records (DD Form 214, Certificate of Release or Discharge from Active Duty, Certificate of Discharge, Report of Transfer or Discharge)
- Military ID card indicating service in the armed forces
- correspondence or contact from the Department of Veteran Affairs including benefit payment or award letter
- VA ID Card
- correspondence or contact from the Department of Veteran Affairs indicating service in the armed forces
- driver's license indicating veteran status<sup>12</sup>

### **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. The solution is to pass [The Improving Access to Nutrition Act \(H.R. 1510/ S. 2435\)](#) to end the SNAP time limit permanently.

There also are additional SNAP improvements needed beyond time limit exemptions for veterans — such as state adoption of policies to streamline access, a less complicated application processes, more targeted outreach aimed at reducing stigma, and more robust application assistance. These are outside the scope of this brief.

### **Resources**

Maintaining SNAP Benefits for Unemployed and Underemployed People Struggling in the Labor Market [https://frac.org/wp-content/uploads/SNAP-Time-Limits\\_R3.pdf](https://frac.org/wp-content/uploads/SNAP-Time-Limits_R3.pdf)

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

USDA Food and Nutrition Service, SNAP Able-Bodied Adults Without Dependents (ABAWD) Policy Guide <https://www.fns.usda.gov/snap/guide-serving-abawds-time-limit-participation>

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

## Endnotes

<sup>1</sup> This brief uses the term “exemptions” to describe those who are exempt from the ABAWD time limit. USDA Food and Nutrition Service may use the term “exceptions” to describe the same policy.

<sup>2</sup> Fiscal Responsibility Act of 2023, Pub. L. No. 118-5 (2023).  
<https://www.congress.gov/118/plaws/publ5/PLAW-118publ5.pdf>.

<sup>3</sup> Dubowitz, Tamara, Andrea Richardson, Teague Ruder, and Catria Gadwah-Meaden, Reducing Policy Barriers to SNAP Participation by Food-Insecure Veterans. Santa Monica, CA: RAND Corporation, 2023.

[https://www.rand.org/pubs/research\\_briefs/RBA1363-1.html](https://www.rand.org/pubs/research_briefs/RBA1363-1.html).

<sup>4</sup> Rabbitt, Matthew P. and Michael D. Smith May 2021. Food Insecurity Among Working-Age Veterans, ERR-829, U.S. Department of Agriculture, Economic Research Service, 2021 [https://www.ers.usda.gov/webdocs/publications/101269/err-829\\_summary.pdf?v=562.4](https://www.ers.usda.gov/webdocs/publications/101269/err-829_summary.pdf?v=562.4).

<sup>5</sup> Ibid.

<sup>6</sup> Ibid.

<sup>7</sup> Ashbrook, A. (2022, November 10). Too Many Veterans Battle With Hunger — Food Research & Action Center. Food Research & Action Center. <https://frac.org/blog/too-many-veterans-battle-with-hunger>.

<sup>8</sup> Veterans Receiving SNAP Benefits by State. (2021, April 12). USDA Food and Nutrition Service. <https://www.fns.usda.gov/snap/veterans-receiving-snap-benefits-state>.

<sup>9</sup> Dubowitz, Tamara, Andrea Richardson, Teague Ruder, and Catria Gadwah-Meaden, Food Insecurity Among Veterans: Examining the Discrepancy Between Veteran Food Insecurity and Use of the Supplemental Nutrition Assistance Program (SNAP). Santa Monica, CA: RAND Corporation, 2023.

[https://www.rand.org/pubs/research\\_reports/RRA1363-2.html](https://www.rand.org/pubs/research_reports/RRA1363-2.html).

<sup>10</sup> 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>.

<sup>11</sup> Ibid.

<sup>12</sup> FNS’s implementation 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.

## Acknowledgements

This brief was authored by Food Research & Action Center’s (FRAC) Director of Root Causes and Specific Populations Alexandra Ashbrook, with support from Irene Lewis, FRAC SNAP policy analyst, and Lauren Drumgold, FRAC SNAP policy intern, and reviewed by the National Military Family Association.

**For research citation:** Food Research & Action Center (FRAC). (2023). *Streamlining Veterans New SNAP Time Limit Exemption* [Fact Sheet]. Available at: <https://frac.org/wp-content/uploads/Veterans-SNAP-Time-Limit-Exemption-Fact-Sheet.pdf>.