

State Approaches to the Volunteer Option to Meet SNAP Time Limit Work Requirements

National Landscape Analysis | July 2026

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 March 2026.¹

Research demonstrates that SNAP alleviates hunger, improves nutrition and health outcomes, stimulates local economies, and reduces long-term health care costs.² Yet, SNAP's three-month time limit for certain adults, commonly referred to as Able-Bodied Adults Without Dependents (ABAWDs), who cannot meet work documentation requirements, continues to restrict access to food assistance for many people facing unstable work, caregiving responsibilities, health limitations, or administrative barriers.

SNAP has had time limits since the 1996 passage of the Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA). ABAWDs are limited to three months of SNAP participation in a three-year period unless they document 80 hours of work each month or participate in a SNAP Employment & Training (E&T) program. The July 2025 budget reconciliation law (OBBBA/H.R. 1) significantly expanded the reach of these time limits by raising the upper age threshold from 54 to 64,³ placing millions more adults at risk of losing food assistance unless they meet strict work documentation requirements or qualify for an exemption. While federal policy allows affected individuals to satisfy time limit requirements through volunteering or unpaid work, access to this option depends heavily on how states communicate about, administer, and support it. (See Appendix A for more detailed information on SNAP work requirements and time limits.)

This brief explores how states are implementing the volunteer option to help prevent ABAWDs from losing SNAP benefits in light of the recent expansion of the population subject to time limits. Based on the Food Research & Action Center's (FRAC) landscape scan of all 50 states and the District of Columbia and a review of state SNAP agency websites, materials, and other communications,⁴ this analysis highlights significant variation in state implementation, identifies promising practices, and outlines the operational, participant, and community challenges that limit the effectiveness of volunteering as a safeguard against benefit loss.

The Volunteer Option

Federal regulations allow individuals subject to the time limit to meet their 80-hour requirement by volunteering or performing unpaid work. This volunteer option has historically been folded under the banner of "workfare," an arrangement where a SNAP participant performs labor in exchange for their SNAP benefit, but U.S. Department of Agriculture (USDA) guidance on the ABAWD work requirement is broader, stating that "work can be for pay, for goods or services (for something other than money), unpaid, or as a volunteer."⁵ Moreover, USDA has provided limited operational guidance on how states should structure, communicate, or support the volunteer option, creating significant flexibility for states to design approaches that either reduce barriers and expand access or leave participants without a meaningful pathway to comply.

H.R. 1 significantly expanded the population subject to SNAP ABAWD time limits by raising the upper age limit from 54 to 64 and narrowing several longstanding exemptions. As a result, millions of additional adults — including adults ages 55–64, parents and other caregivers of children age 14 and older, veterans, individuals experiencing homelessness, and young adults who have aged out of foster care — must now document at least 80 hours per month of work or a qualifying work activity, or qualify for an exemption, to maintain SNAP benefits beyond the three-month time limit. Many of these individuals face significant barriers to employment. Older adults, in particular, may have retired, left the workforce involuntarily, or face age-related challenges finding new employment. For this population, the volunteer option may be a viable way to meet requirements.

However, the ability of a SNAP participant to use the volunteer option to meet work requirements is dependent on their SNAP state agency's communication about this pathway and the support the agency provides participants throughout the process: providing information, connecting people to volunteer opportunities, and making it possible for them to document their volunteer work participation.

Note: There is substantial variation in how and when states are implementing the expanded ABAWD time limit rules of H.R. 1, including implementation dates, implementation strategies, counting of the 36-month period, and intrastate geographic variation. (See Appendix A for details.)

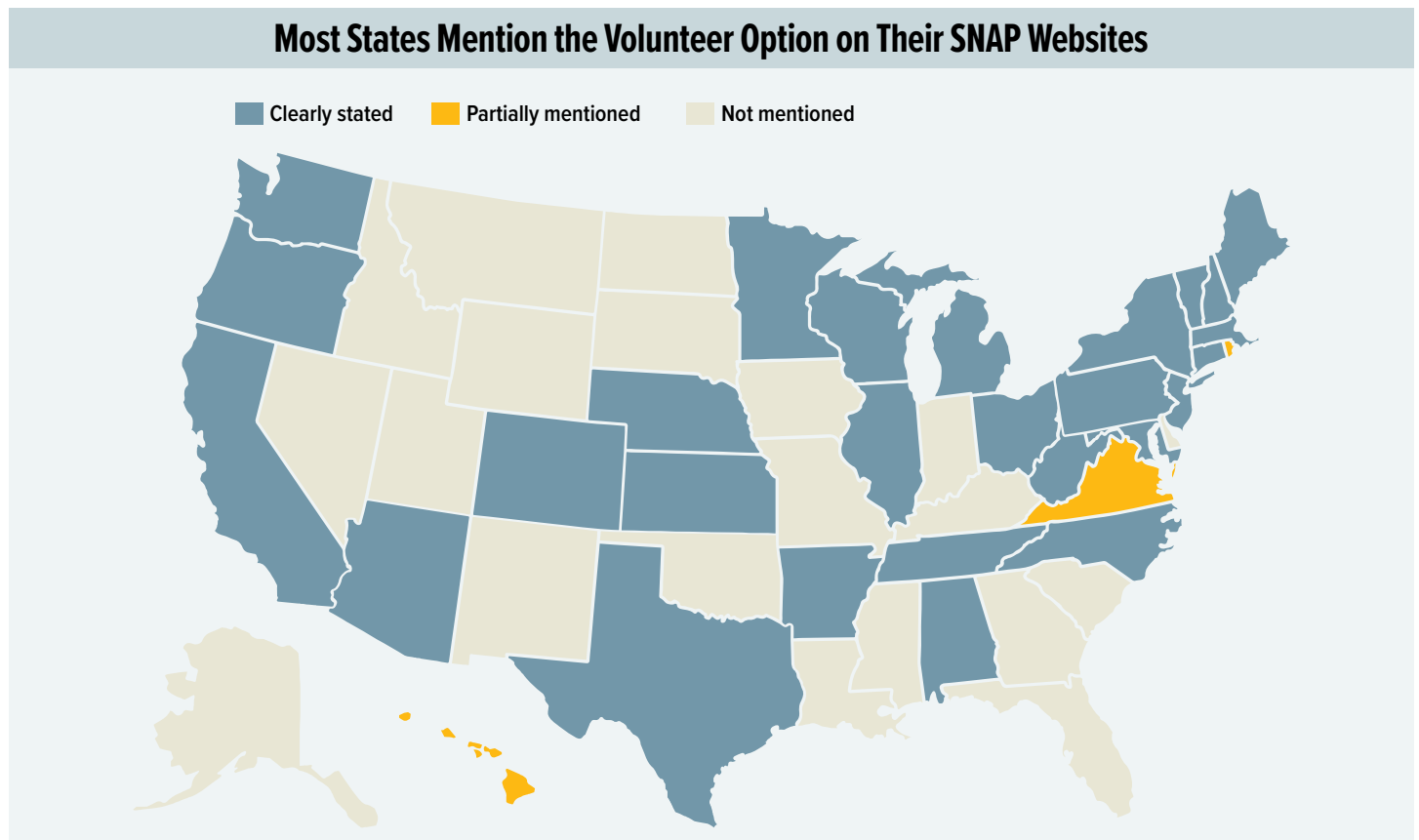
Variation Across States

Though all states must implement the same SNAP time limit rules, there is wide variation in how they publicize the volunteer option, communicate its details, and support participants' ability to use it. This section explores the state-to-state differences in approach. (See table in Appendix B.)

Publicly Available Information

State SNAP agency websites are substantially different from each other in terms of design and layout, but also in how much information they provide about SNAP eligibility, benefit levels, and participation requirements — including the volunteer option for meeting work requirements — and whether key information is available on the homepage or is buried in subpages or available only by downloading PDFs.

FRAC's review of state SNAP websites found that 20 states do not include a statement about volunteering on their SNAP webpages, 27 states and the District of Columbia do, and three states only partially make it clear. This review is accurate as of June 4, 2026.



Of the 27 states and the District of Columbia that clearly state on their SNAP websites that volunteering is an option for meeting work requirements for time-limited SNAP participants, 11 have the information on their SNAP homepage, 15 have a link on the SNAP homepage that takes the user to a separate page about ABAWDs or work requirements or have a link to a PDF with the information, and two states have difficult-to-find or incomplete information — one has a very hard-to-find ABAWD page link on the SNAP homepage and the other has an ABAWD link that goes to the USDA's page on work requirements.⁶

Of the three states with partial information, two do not mention work requirements or the volunteer option on their SNAP websites; their social services departments provide the information on a separate webpage that is not linked to from the SNAP website. The third state has the information on the SNAP website but lists volunteering as an ABAWD exemption rather than a work activity.

Volunteer Provision Support

The second stage of the landscape scan considered what type of support states provide to people who want to volunteer to meet requirements. There is wide variation across states, ranging from a complete absence of any information about volunteering to thoughtfully built-out programs to support volunteers.

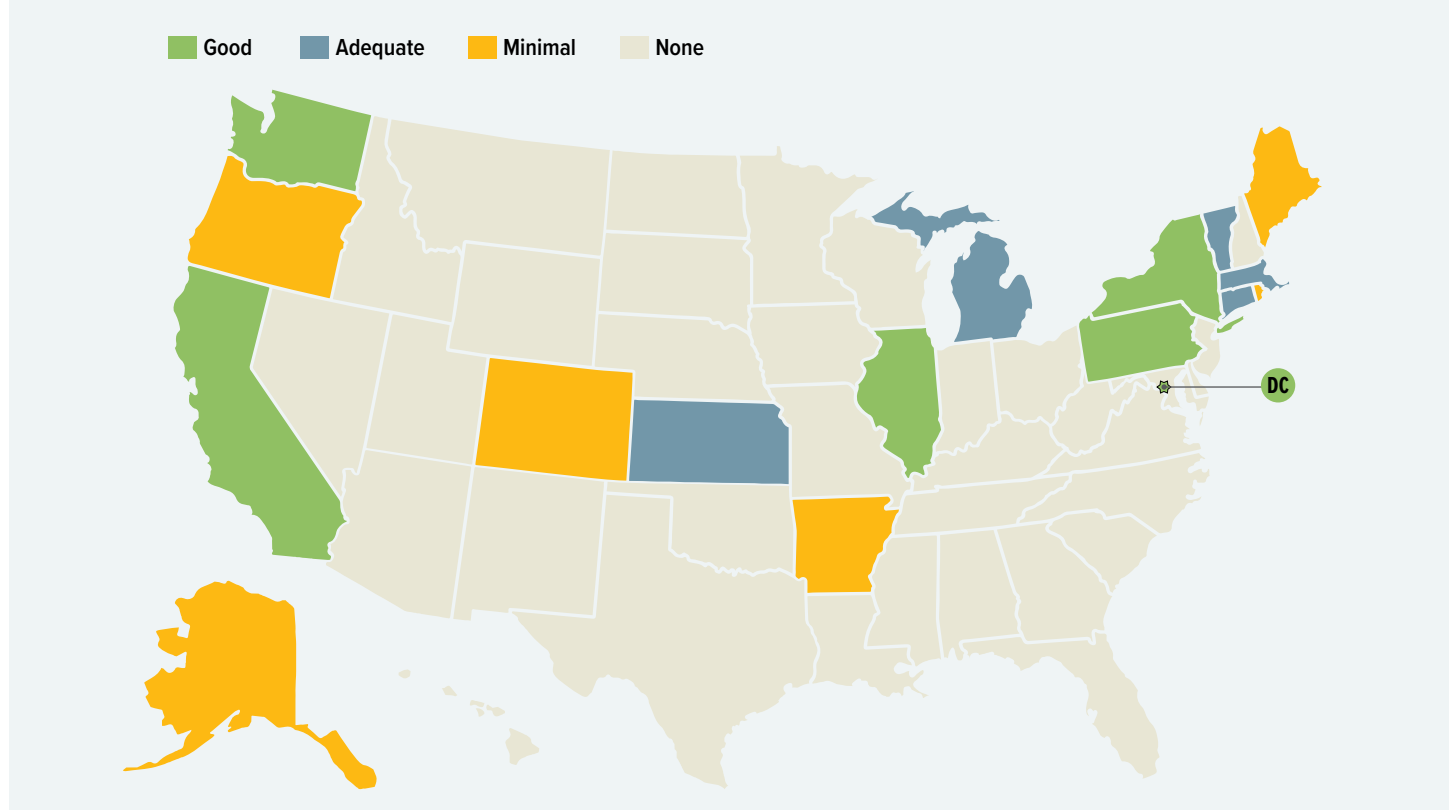
Even among the states that clearly mention the volunteer option, most limit the information they provide to a bullet point that includes volunteering among other work options. For example, a typical state SNAP website says something like the following:

There are three main ways to meet the ABAWD requirement:

1. *Working or volunteering at least 80 hours per month.*
2. *Participating in a work training program for at least 80 hours per month.*
3. *Working, volunteering, and taking part in a work program for a combined total of at least 80 hours each month.*

The other states offer some level of support for volunteering, ranging from providing additional information about how to document volunteer hours to a full-on program to connect people to volunteer opportunities.

Only a Handful of States Offer Support for the Volunteer Option



Six states provide minimal support, offering only a form or a template for documenting hours or some general information about volunteering that may be outdated or provided without context.⁷ Five states provide adequate support, linking to volunteer opportunity databases maintained by partner organizations such as United Way, supporting workfare or volunteer work through SNAP Employment and Training, and providing more detailed information on documenting volunteer participation and submitting it to the SNAP agency.

An additional five states and Washington, D.C., offer good support, with fully conceptualized volunteer programs and processes. These states employ a variety of strategies to make it possible for people to avoid losing SNAP benefits through volunteer participation, including direct assistance connecting people to volunteer activities, offering really clear information on how to calculate the required number of hours (see box), and providing tools for tracking and verifying participation. These best-practice state programs are described in greater detail below.

Volunteering in State SNAP E&T Plans

Forty-one states do not mention volunteering in their state SNAP E&T plan. Nine states and the District of Columbia do mention volunteering and community service, ranging from simply communicating that it is an option during screening processes, to requiring E&T providers to record participants' community service and include it in reports, to providing hands-on services that connect people to volunteer work or workfare placements.

Not all volunteer support through E&T systems is included in these SNAP E&T plans filed annually. For instance, New York City is referring people who want to volunteer to PACE, one of the city's workforce development providers. Case managers there help connect people to volunteer work, track hours, and report participation to the SNAP agency. This program is not described in the New York state SNAP E&T plan.

Calculating Required Volunteer Hours

While most state websites describe volunteering or performing unpaid work as a way to meet the 80 hours per month requirement, states can opt to use the "workfare calculation" to determine the required number of volunteer hours. This calculation is the household's SNAP benefit divided by the local minimum wage.

For example, if a two-person household in New York City, where the minimum wage is \$17/hour, has a monthly SNAP benefit of \$544, they would be required to volunteer for 32 hours a month. If that household lived in Alabama, where the minimum wage is \$7.25/hour, they would have to volunteer for 75 hours a month. These hours can be divided among all ABAWDs in the household.

Though there is no formal guidance from USDA on how states must implement the volunteer provision, this workfare calculation is generally only applied to formal volunteer work with an approved community-based organization. People performing informal unpaid work, such as caring for a neighbor's children, would be required to do this work for 80 hours per month.

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.

Best Practices

To assist states and community partners as they continue to develop policies and programs to help time-limited SNAP recipients avoid benefit loss through volunteer participation, we highlight a handful of best practice case studies: a dedicated volunteer program in **New York City**, very clear communication by the state of **Pennsylvania**, and a strong partnership with the United Way in **Vermont**.



Dedicated Program for Volunteering

The **New York City** Department of Social Services (DSS) has created a dedicated program for ABAWD volunteering. First, it has created two pathways for community organizations to offer volunteer positions to time-limited SNAP participants: the Community Service Provider (CSP) track for organizations that can support structured, compliance-driven service activities, and the Self-Enrolled Volunteer Service Provider (SEVSP) track for organizations that can offer voluntary, small-scale opportunities. DSS has created a web portal for organizations to register so they can be vetted and enrolled in the program by DSS staff. Second, DSS has engaged one of the agency's workforce providers to manage volunteer work participation. ABAWDs who

want to take up the volunteer option are referred to this provider, who calculates the number of hours a participant needs to complete (using the workfare calculation), connects them with a suitable volunteer position, and tracks hours and reports back to the SNAP agency. Participants who wish to self-manage their volunteer work can do so through the SEVSP pathway.



Clear Communication of Nuances

Pennsylvania is a model state for its approach to clearly communicating the nuances of the volunteer provision, especially regarding how required hours are calculated. In a recorded webinar available on the state's SNAP work requirements webpage and on YouTube, they carefully describe how selecting the 80-hour per month unpaid work option may be more advantageous than using the workfare calculation, but when a household's circumstances change — such as a teenage member of the household turning 18 — converting community service participation to workfare could reduce the number of hours a participant would need to volunteer to avoid losing SNAP benefits.⁸

Pennsylvania has multiple ways to connect people to volunteer work. The Department of Human Services (DHS) maintains a website, PA Navigate, that SNAP participants can use to search for volunteer opportunities. SNAP participants can also be referred to an EARN center (one of the state's employment and training programs) to connect with volunteer work and have these hours tracked and reported.



Partnerships for State-Supported Volunteer Placements

In **Vermont**, the United Way has stepped up to connect SNAP participants to volunteer placements. They have created a dedicated landing page for SNAP participants, advertising their volunteer coordination program and cooperation with local nonprofits across the state, with links to all the regional United Ways' volunteering websites.⁹ They are also using social media channels like Instagram to promote their ability to connect people to volunteer work.

The volunteer connection websites hosted by regional United Ways currently list available volunteer opportunities, including on-site activities, such as helping with intake at a food pantry or providing translation services at a medical clinic, as well as remote opportunities, such as data entry or grant writing. Each listing includes the location, time commitment, description of the tasks, and a contact person at the organization.

Recommendations for State Agencies

All SNAP participants have the option to participate in volunteer work to meet their eligibility requirements, avoid time limits, and stay connected to critical nutrition support. However, for this pathway to be effective and practical, state SNAP agencies need to take concrete actions. State agencies should:

- ▶ **Communicate the volunteer option to SNAP participants.** States' SNAP websites should provide clear, easy-to-find information about SNAP eligibility rules, including who is subject to time limits, and explain how people can meet requirements, including through volunteering.
- ▶ **Create a process and explain the details.** States should describe which types of organizations or volunteer activities count toward volunteer hours, provide information on the workfare calculation for the required number of hours, and specify how SNAP participants can document their volunteer hours and how often verification must be submitted.
- ▶ **Make it easy for volunteers.** Create easy-to-use forms for volunteers and organizations, and develop simple processes for submitting documentation, such as a mobile app for document uploads or text-message-based verification.
- ▶ **Train staff.** Develop new and refresher training for eligibility workers and staff who process documentation to ensure they provide consistent, accurate information about volunteering to SNAP participants and accurately document compliance in SNAP systems.
- ▶ **Go above and beyond.** States that want to truly ensure that the volunteer option exists to help people avoid losing SNAP can develop thoughtful volunteer participation programs, establish partnerships with local community organizations, and find ways to directly place SNAP participants in appropriate volunteer roles — which can include tasks that can be done from home, like making phone calls or working with data — with enough hours to meet requirements.

Conclusion: The Volunteer Option Is not a Panacea

Allowing time-limited SNAP participants to meet work requirements through volunteering may be a welcome option for some. All states should make this clear, provide comprehensive information about how to calculate hours and document participation, and develop or strengthen programs to connect people to volunteer placements.

However, the existence of the volunteer option does not negate the fundamental flaws of imposing time limits on SNAP participation. Evidence shows that the arbitrary three-month time limit does not improve employment outcomes; it only reduces SNAP participation and deprives people who need it of critical food assistance.¹⁰ Most of the adults who rely on SNAP are working, but at jobs that provide low wages with unpredictable hours, few benefits, and limited opportunities to advance.^{11,12} Including a volunteer option to avoid time limits does not address these systemic issues and introduces new challenges that states, community-based organizations, and SNAP participants must contend with.

State agencies must develop their own policies, systems, and processes without any dedicated federal funding, guidance, or technical assistance from USDA.

Community organizations, many of which operate on small budgets with minimal staff, face pressure to help time-limited SNAP participants avoid losing their benefits, yet lack the resources to hire additional staff to manage volunteers, track participant hours, and verify time worked. For example, small food pantries, often run by older volunteers, lack the staff or systems to manage placements and are open very limited hours and days of the week; many nonprofits reduced or eliminated casual volunteer roles after the COVID-19 pandemic.

SNAP participants must find enough hours at volunteer sites that match their skills and capabilities, which can be particularly difficult for people in rural areas where volunteer sites are limited or far away, for people facing transportation challenges, and for people with any history that may legally restrict their ability to pass background checks.¹³ Unlike SNAP E&T, which provides reimbursements for transportation, clothing, or child care, there are no institutional supports for volunteer work.

Knowing that most SNAP participants who can work do, the best strategy to help time-limited SNAP participants avoid losing benefits is to screen people for exemptions — including caregiving, disability, and other “unfitness for work” — that will allow them to participate in SNAP continuously and put food on the table for them and their families.

Suggested research citation: Thrasher, D., & Plata-Nino, G. (2026). *State approaches to the volunteer option to meet SNAP time limit work requirements*. Food Research & Action Center. <https://frac.org/wp-content/uploads/Volunteer-SNAP-Work-Requirements.pdf>

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Appendix A: SNAP Work Requirements and Time Limits

Historical Context: SNAP Work Requirements and Time Limits

SNAP participation rules include two distinct work-related frameworks: general work requirements and the stricter time limit rules historically applied to certain adults classified as Able-Bodied Adults Without Dependents (ABAWDs).

Most adults age 16 to 59 who are physically and mentally able to work are subject to SNAP's general work requirements, which include registering for work, accepting suitable employment if offered, participating in assigned SNAP E&T activities when required, and not voluntarily leaving employment or reducing work hours without good cause.

In addition to these baseline rules, ABAWD time limits impose an additional restriction. Individuals may receive SNAP for only three months within a 36-month period unless they document compliance with qualifying work activities, generally averaging 80 hours per month through employment, SNAP E&T, workfare, or other approved activities (see box). Individuals who fail to meet these requirements for three months lose SNAP eligibility until they meet the work requirements or qualify for an exemption.

While these requirements are framed as work incentives, states are not required to provide sufficient employment and training slots, workfare placements, or other structured pathways to compliance, leaving many individuals with limited realistic options for maintaining eligibility.

When Congress established the ABAWD time limit policy in 1996, it was narrowly targeted at adults without dependents, explicitly excluding parents and caregivers in recognition of their caregiving responsibilities.

Before enactment of H.R. 1 in July 2025, exemptions applied to individuals under age 18 or over age 54, people with verified disabilities, pregnant individuals, parents or caregivers of children under 18, veterans, individuals experiencing homelessness, and young adults under age 25 who had aged out of foster care. Congress added exemptions for veterans, youth aging out of foster care, and individuals experiencing homelessness through the Fiscal Responsibility Act of 2023, recognizing the significant barriers these populations face in securing stable employment.

Who Is an ABAWD?

Able-Bodied Adults Without Dependents, or ABAWDs, are:

- ▶ between age 18-64
- ▶ are not pregnant
- ▶ do not live with a child under age 14
- ▶ do not have any physical or mental barriers to employment

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 age 6 or younger outside the home, such as caregiving for a grandchild, a neighbor's child, etc.
- ▶ take care of a disabled adult or child
- ▶ are pregnant
- ▶ have earned income (before taxes) of \$217.50 per week, 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

H.R. 1 substantially expanded the reach of these time limits by increasing the upper age threshold from 54 to 64, eliminating exemptions for veterans, individuals experiencing homelessness, and former foster youth, and extending time limits for the first time to certain caregivers, including parents, grandparents, and others responsible for children age 14 and older.

These changes fundamentally altered the original policy structure, expanding time limits to populations previously recognized as facing distinct barriers to employment or caregiving responsibilities. The Congressional Budget Office estimated that these changes would result in an average of approximately 1.4 million people losing SNAP eligibility each month.

H.R. 1 also significantly narrowed states’ ability to mitigate harm through geographic waivers. Historically, states could request waivers in areas experiencing elevated unemployment or insufficient job availability. H.R. 1 eliminated the insufficient jobs criterion, limiting waivers to areas with unemployment rates above 10 percent. The Congressional Budget Office estimated that this change alone would reduce SNAP participation by roughly 1 million people per month.¹⁴

Although the statutory changes took effect in 2025, implementation has varied significantly across states. Because SNAP eligibility is assessed at application, recertification, and interim reporting milestones, states have adopted different implementation timelines, screening practices, methods for counting the 36-month eligibility period, and geographic approaches to applying the rules.

Implementation Date

Though the expanded time limit rule officially took effect on October 1, 2025, many states set different start dates. These are shown in Table 1.

TABLE 1: Time Limits Implementation Start Dates

Date of Implementation	Number of States	Notes
September 2025	1	Pennsylvania started on September 1, 2025, but delayed implementation for some groups.
October 2025	24	October 1, 2025, for Arizona (all counties except one, which started September 1, 2025), Colorado, Florida, Idaho, Indiana, Kansas, Louisiana, Maine, Mississippi, Montana, Nevada, New Jersey, New Mexico, Ohio, Oklahoma, Oregon, South Carolina, South Dakota, Utah, West Virginia, Wisconsin, and Wyoming. Nebraska began October 20, 2025. Vermont officially started on October 1, 2025, but is not counting any months before December 2025.
November 2025	14	Alaska, Arkansas, Delaware, Georgia, Kentucky, Maryland, Massachusetts, Minnesota, Missouri, New Hampshire, North Dakota, Rhode Island, Texas, and Virginia
December 2025	3	Connecticut, Michigan, and North Carolina
January 2026	1	Tennessee
February 2026	3	Alabama, Illinois, and Washington
March 2026	1	New York
June 2026	2	California, and D.C.
September 2026	1	Hawaii will not officially implement time limits until September 30, 2026, but began screening, tracking, and enforcing limits beginning November 2025.
December 2026	1	Iowa

Implementation Strategy

While most states are applying ABAWD time limits to new, recertifying, and ongoing cases, five states are only assessing people for ABAWD status at application, recertification, or other touchpoints, such as when a state reports a change in income or adds a household member. Three states are screening only at application and recertification, and one state is screening only at application and recertification, except for a special review of Elderly Simplified Application Project (ESAP) households with members age 60–64.

TABLE 2: Time Limits Implementation Strategies

Implementation Strategy	Number of States	Notes
At application, recertification, and for ongoing cases	41	Arizona, Arkansas, Colorado, Connecticut, Delaware, D.C., Florida, Georgia, Idaho, Illinois, Indiana, Iowa, Kansas, Kentucky, Louisiana, Maine, Michigan, Mississippi, Missouri, Montana, Nebraska, Nevada, New Hampshire, New Jersey, New Mexico, New York, North Dakota, Ohio, Oklahoma, Oregon, Pennsylvania, Rhode Island, South Carolina, South Dakota, Tennessee, Utah, Virginia, Washington, West Virginia, Wisconsin, and Wyoming
At application and recertification	5	Alaska, California, Massachusetts, Minnesota, and North Carolina
At application, recertification, or other touchpoints (such as a change in income)	4	Alabama, Hawaii, Maryland, and Vermont
At application and recertification, with a special review for ESAP households with SNAP participants age 60–64	1	Texas

Counting the 36-Month Period

The time limits mean that ABAWDs who do not meet the documentation requirements can receive SNAP for only three months within a 36-month period. States can choose either to identify one 36-month period that applies to all SNAP participants (referred to as a “statewide clock”) or to use individual-specific 36-month periods (“individual clocks”).

Thirty-five states use a statewide clock. The 36-month periods are not all aligned — for instance, Louisiana’s clock reset April 1, 2026, and will go through March 31, 2029, while Kansas runs October 1, 2025, through September 30, 2028. Eight states opt for an individual clock, and there is variation in practice here, too. Some states have a fixed 36-month clock beginning with the month of application or the month of first benefit receipt; others have a rolling clock that begins with the first month that someone is out of compliance with the work rules.

Geographic Variation

Finally, there is variation in the geographic application of the ABAWD rules. Forty-two states have no geographic exceptions with the rules applied across the state. The other nine states have time limit waivers for certain counties or Tribal lands.

TABLE 3: Time Limits Clock Types

36-Month Period	Number of States	Notes
Statewide clock	35	Alabama, Alaska, Arizona, Arkansas, California, Colorado, D.C., Florida, Georgia, Illinois, Iowa, Kansas, Louisiana, Maine, Maryland, Massachusetts, Michigan, Minnesota, Missouri, Montana, Nevada, New Jersey, New Mexico, New York, North Carolina, Oregon, Pennsylvania, Rhode Island, South Dakota, Tennessee, Vermont, Washington, and Wyoming
Individual clock	8	Connecticut, Nebraska, New Hampshire, North Dakota, Ohio, Oklahoma, Texas, and Utah
Unknown	8	Delaware, Hawaii, Idaho, Indiana, Kentucky, Mississippi, South Carolina, and Virginia

Appendix B: Volunteer Option Variation Table

■ The most positive and helpful information and practices
 ■ Helpful steps that fall short of best practices
 ■ Minimally adequate information or support
 ■ State has not made any information available or taken any steps to provide support

State	Volunteer Provision Stated	Information Location	Volunteer Provision Support	Volunteer Info in E&T Plan
Alabama	Yes	Link on main SNAP website to an eligibility requirements PDF	None	No
Alaska	No	None	Information about volunteering on the main SNAP website with links to organizations that accept volunteers. This is not specific to ABAWDs.	No
Arizona	Yes	ABAWD work requirements webpage, very difficult to find on state SNAP website	None	No
Arkansas	Yes	On main SNAP website	State has a guide about meeting work requirements through volunteering, though it appears to date from 2018 and the links to the volunteer opportunity resources do not work.	No
California	Yes	On main SNAP website; NOTE: information is not on getcalfresh.org.	CalFresh handbook includes a section on community service or volunteer work, with guidance on hours verification and a reference to the CalFresh Volunteer Work Verification Form (CF 888). The section also includes links to a selection of possible volunteer opportunities.	Yes
Colorado	Yes	Link on main SNAP webpage to SNAP ABAWD page	Volunteer verification reporting form available.	Yes
Connecticut	Yes	Link on main SNAP website to H.R. 1 work requirements page	State SNAP page links to the United Way of Connecticut's volunteer opportunities page, which highlights the SNAP volunteer option.	No
Delaware	No	None	None	No
District of Columbia	Yes	On main SNAP website	D.C. is using "workfare" and "SNAP Volunteer Program" interchangeably. Volunteer program run through SNAP E&T, matches people to volunteer opportunities. Provides a form for organizations to make available volunteer positions known.	Yes
Florida	No	None	None	No
Georgia	No	None	None	No
Hawaii	Partially	Separate ABAWD changes FAQ not linked from main SNAP page	None	No
Idaho	No	None	None	No
Illinois	Yes	Large banner on main SNAP website links to "Meeting SNAP Work Requirements."	Volunteer opportunities page on the website links to Serve Illinois database. Additional page about meeting work requirement links to multiple volunteer opportunity databases and United Way. State gives clear instructions for reporting volunteer hours; and provides a form for reporting community service.	No
Indiana	No	None	None	No

APPENDIX B: VOLUNTEER OPTION VARIATION TABLE CONTINUED

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State	Volunteer Provision Stated	Information Location	Volunteer Provision Support	Volunteer Info in E&T Plan
Iowa	No	None	None	No
Kansas	Yes	Link on main SNAP webpage to an ABAWD PDF	Kansas has mandatory E&T participation for ABAWDs. E&T includes volunteering as an employment component.	Yes
Kentucky	No	None	None	No
Louisiana	No	None	None	Yes
Maine	Yes	On main SNAP website	Volunteer verification reporting form available. Form includes an explanation about calculating hours.	No
Maryland	Yes	On main SNAP website	None	No
Massachusetts	Yes	Link on main SNAP webpage to a SNAP Work Rules page	Website FAQ question about how to meet requirements by volunteering is answered by pointing people to a website with a list of ABAWD volunteer sites. A separate PDF FAQ is available for organizations willing to serve as volunteer sites; state also has a form for organizations to register as a volunteer site.	No
Michigan	Yes	Link on main SNAP webpage to a SNAP Work Rules page	Support for workfare through E&T.	Yes
Minnesota	Yes	Link on main SNAP webpage to a SNAP Work Rules page	None	No
Mississippi	No	None	None	No
Missouri	No	None	None	No
Montana	No	None	None	No
Nebraska	Yes	Link on main SNAP webpage to an H.R. 1 FAQ PDF	None	No
Nevada	No	None	None	No
New Hampshire	Yes	On main SNAP website	None	No
New Jersey	Yes	Link on main SNAP webpage to an ABAWD page	None	No
New Mexico	No	None	None	No
New York	Yes	On main SNAP website	State volunteer verification reporting form available. In NYC, volunteer participation is managed through an E&T provider. New York state and New York City both have portals for community organizations to offer volunteer work to SNAP participants.	No
North Carolina	Yes	On main SNAP website	None	No
North Dakota	No	None	None	No

APPENDIX B: VOLUNTEER OPTION VARIATION TABLE CONTINUED

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State	Volunteer Provision Stated	Information Location	Volunteer Provision Support	Volunteer Info in E&T Plan
Ohio	Yes	"Work requirements" links only to USDA's ABAWD website.	None	No
Oklahoma	No	None	None	No
Oregon	Yes	Button on main SNAP page links to a work rules page.	State provides instructions on how to provide volunteer verification.	Yes
Pennsylvania	Yes	Link on main SNAP webpage to a SNAP Work Rules page. Very helpful webinar recording posted.	Volunteer verification reporting form available. PA Navigate website connects people to volunteer activities. State has a process for connecting people to opportunities and reporting volunteer hours through EARN centers or people can track hours independently.	Yes
Rhode Island	Partially	Not on main SNAP website; separate "SNAP updates" website not linked from main page.	Volunteer verification reporting form available.	No
South Carolina	No	None	None	Yes
South Dakota	No	None	None	No
Tennessee	Yes	On main SNAP website	None	No
Texas	Yes	Link on main SNAP webpage to a SNAP work requirements page	None	No
Utah	No	None	None	No
Vermont	Yes	On main SNAP website	Clear instructions about uploading verification, flexibility in types of documentation. United Way is offering connections to volunteer opportunities for ABAWDS.	No
Virginia	Partially	On main SNAP website; volunteering listed as an ABAWD exemption.	None	No
Washington	Yes	Link on main SNAP webpage to an ABAWD page	Staff can match people to workfare agencies. State provides an ABAWD activity report to help people verify hours.	No
West Virginia	Yes	Link on main SNAP webpage to an ABAWD PDF	None	No
Wisconsin	Yes	Link on main SNAP webpage to a SNAP work requirements page	None	No
Wyoming	No	None	None	Yes

Endnotes

- 1 United States Department of Agriculture (n.d.). SNAP Data Tables. <https://www.fna.usda.gov/pd/supplemental-nutrition-assistance-program-snap>
- 2 Food Research & Action Center. (December 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 The ABAWD age range was expanded from 18-49 to 18-54 with the passage of the Fiscal Responsibility Act of 2023.
- 4 Findings in this report are drawn from publicly available information from 51 SNAP state agencies, as well as insights from SNAP advocates across the country. FRAC would like to thank our network members who provided key details on how time limits and the volunteer provision are being implemented in their local areas.
- 5 United States Department of Agriculture, Food and Nutrition Service. (n.d.) *SNAP work requirements*. <https://www.fns.usda.gov/snap/work-requirements>. Accessed May 1, 2026.
- 6 Notably, at the time of this writing, the USDA SNAP Work Requirements website had not yet been updated with the H.R. 1 changes.
- 7 For example, one state offers information about volunteering generally, with links to organizations that accept volunteers, but this information is given without any context and does not appear to be specifically aimed at time-limited individuals. Another state provides a guide for meeting work requirements through volunteering that dates from 2018 and contains only broken links.
- 8 Pennsylvania Department of Human Services. (Feb. 23, 2026). *Meeting SNAP work and engagement requirements by volunteering (video)*. <https://www.youtube.com/watch?v=VeUF8QgbVbg>
- 9 <https://vermont211.org/volunteer-with-vermont-211>
- 10 Vericker, T., Wheaton, L., Baier, K., & Gasper, J. (2023). The impact of ABAWD time limit reinstatement on SNAP participation and employment. *Journal of Nutrition Education and Behavior*. 55(4):285-296.
- 11 U.S. Department of Agriculture, Food and Nutrition Service, Evidence, Analysis, and Regulatory Affairs Office. (2025). *Characteristics of Supplemental Nutrition Assistance Program households: Fiscal year 2023*, by Mia Monkovic and Ben Ward. Project Officer, Aja Weston. Alexandria, VA, 2025. <https://fns-prod.azureedge.us/sites/default/files/resource-files/snap-FY23-Characteristics-Report.pdf>
- 12 Brown Barnes, C. (2020). *Federal social safety net programs: Millions of full-time workers rely on federal health care and food assistance programs*. Report to the Ranking Member, Committee on the Budget, U.S. Senate. U. S. Government Accountability Office. <https://www.gao.gov/products/gao-21-45>
- 13 Sisk, T. (April 26, 2026). *Food stamp work rules don't increase employment, researchers say*. Daily KOS. <https://www.dailykos.com/stories/2026/4/26/800027274/news/food-stamp-work-rules-dont-increase-employment-researchers-say>
- 14 Swagel, Phillip L. (May 22, 2025). Letter to Sen. Amy Klobuchar and Rep. Angie Craig from the U.S. Congressional Budget Office. https://www.cbo.gov/system/files/2025-05/Klobuchar-Craig-Letter-SNAP_5-22-25.pdf



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