

# **Work Requirements: Comparison of Medicaid and Supplemental Nutrition Assistance Program (SNAP) After P.L. 119-21**

December 11, 2025

**Congressional Research Service**

<https://crsreports.congress.gov>

R48755



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## Work Requirements: Comparison of Medicaid and Supplemental Nutrition Assistance Program (SNAP) After P.L. 119-21

Enacted July 4, 2025, the FY2025 budget reconciliation law (P.L. 119-21) included significant changes to the means-tested programs Medicaid and the Supplemental Nutrition Assistance Program (SNAP). The law created new Medicaid community engagement requirements for specified individuals (Section 71119) and expanded work requirements for SNAP (Section 10102). The Congressional Budget Office (CBO) estimated that the provision establishing the Medicaid community engagement requirements will reduce federal Medicaid outlays by \$325.6 billion from FY2025 to FY2034, and the SNAP provision will reduce federal SNAP outlays by \$69 billion over the same 10-year period. Policymakers may be interested in how the enacted policies compare and contrast as states and households face changes in both programs.

P.L. 119-21 establishes a new *community engagement requirement* as a condition of Medicaid eligibility or continued enrollment for specified individuals who are eligible for (or enrolled under) the Affordable Care Act (ACA) Medicaid expansion pathway or who are eligible for (or enrolled under) a waiver that provides minimum essential health coverage. This group is technically known as “applicable individuals.” Prior to the enactment of P.L. 119-21, there was no statutory requirement for Medicaid enrollees comparable to the new community engagement requirement, although the new statutory provision builds on the first Trump Administration’s Medicaid Section 1115 demonstration waiver initiative that allowed states to implement Medicaid community engagement requirements.

P.L. 119-21 built on an existing SNAP requirement for *Able-Bodied Adults Without Dependents* (ABAWDs). The ABAWD rule was enacted in the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (P.L. 104-193). P.L. 119-21 both expands the population subject to the ABAWD rule and shrinks available waivers and exemptions.

The Medicaid community engagement requirement, once effective, and the expanded SNAP ABAWD rule both apply to Medicaid applicants and enrollees and SNAP participants within the same general population: (1) nondisabled adults between the ages of 18 and 64 for SNAP and the ages of 19 and 64 for Medicaid, without dependents, and (2) parents (and others who are caring for children) between the ages of 18 and 64 (19 and 64 for Medicaid) whose youngest child is aged 14 or older. Some individuals in these populations may be exempted, and some of the exemptions differ between Medicaid and SNAP.

Both Medicaid and SNAP requirements can be met with 80 hours per month of employment, and both allow a combination of employment, participation in a work program, and participation in other activities to count toward the 80-hours-per-month requirement (though the other activities differ).

Key differences include Medicaid’s special provisions for counting the earnings of seasonal workers toward meeting the community engagement requirement, a provision not available under SNAP; Medicaid’s exemption for individuals receiving SNAP who are already subject to SNAP’s work rules; and differing effective dates (December 31, 2026, or earlier at state option under Medicaid; July 4, 2025 for SNAP).

Some individuals affected by the new and revised work requirements may be both Medicaid enrollees and SNAP participants. However, though both the new Medicaid and the revised SNAP requirements apply broadly to similar populations, there are differences in the eligibility rules between the two programs that mean some individuals may receive benefits under one program but not the other. CRS estimates that in 2025, out of 24.7 million persons who were either ACA Medicaid expansion adults without children under the age of 14 (i.e., persons included among the group of “applicable individuals” who are subject to the Medicaid community engagement requirement) or SNAP participants who were non-aged (under the age of 65), nondisabled adults without a child under the age of 14, an estimated 6.2 million were enrolled in both programs.

Federal and state guidance and rulemaking are likely to influence how households, states, and other stakeholders experience the new law.

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Enacted July 4, 2025, the FY2025 budget reconciliation law (P.L. 119-21) included significant changes to the means-tested programs Medicaid and the Supplemental Nutrition Assistance Program (SNAP).<sup>1</sup> The law created new Medicaid community engagement requirements (i.e., work, participation in a work program or community service, or enrollment in an education program) for specified individuals (Section 71119) and expanded work requirements for SNAP (Section 10102).

The Congressional Budget Office (CBO) estimates that the provision establishing the Medicaid community engagement requirements will reduce federal Medicaid outlays by \$325.6 billion from FY2025 to FY2034, and the SNAP provision will reduce federal SNAP outlays by \$69 billion over the same 10-year window.<sup>2</sup> CBO also estimated that the respective provisions would result in an average of 4.5 million people becoming uninsured per year (FY2027-FY2034) and reduce SNAP participation by roughly 2.4 million people in an average month over the 10-year window.<sup>3</sup>

In the 50 states and the District of Columbia, P.L. 119-21 establishes a new *community engagement requirement* for specified Medicaid enrollees as a condition of Medicaid eligibility or continued enrollment. These eligibility restrictions apply to certain enrollees who are eligible for or enrolled under the Affordable Care Act (ACA) Medicaid expansion pathway,<sup>4</sup> or a waiver that provides minimum essential health coverage to “applicable individuals,” as defined in P.L. 119-21.<sup>5</sup>

Prior to the enactment of P.L. 119-21, there was no statutory requirement for Medicaid enrollees comparable to the new community engagement requirement, although the new statutory provision builds on the first Trump Administration’s Medicaid Section 1115 demonstration waiver initiative that allowed states to implement Medicaid community engagement requirements.<sup>6</sup>

<sup>1</sup> See CRS Report R48552, *Supplemental Nutrition Assistance Program (SNAP) and Related Nutrition Programs in P.L. 119-21: An Overview*; CRS Report R48633, *Health Provisions in P.L. 119-21, the FY2025 Reconciliation Law*.

<sup>2</sup> Congressional Budget Office (CBO), *Estimated Budgetary Effects of P.L. 119-21, to Provide for Reconciliation Pursuant to Title II of H. Con. Res. 14, Relative to CBO’s January 2025 Baseline*, July 21, 2025, <https://www.cbo.gov/publication/61570>. The Medicaid figure is in the Title VII tab, and the SNAP figure is in the Title I tab. Both provisions are part of a subtitle for which CBO estimated interactive effects between the provisions, but the cost savings from the individual Sections 71119 and 10102 do not include those effects.

<sup>3</sup> CBO, “Estimated Effects of P.L. 119-21 on Participation and Benefits Under the Supplemental Nutrition Assistance Program,” August 11, 2025, <https://www.cbo.gov/system/files/2025-08/61367-SNAP.pdf>; CBO, “Estimate of Annual Changes in the Number of People Without Health Insurance Under Title VII, P.L. 119-21,” August 11, 2021, available at <https://www.cbo.gov/publication/61367>.

<sup>4</sup> For a list of jurisdictions’ Affordable Care Act (ACA) Medicaid expansion statuses, see KFF, “Status of State Medicaid Expansion Decisions,” accessed on September 12, 2025, <https://www.kff.org/status-of-state-medicaid-expansion-decisions/>. As of September 12, 2025, 40 states and the District of Columbia have adopted the Medicaid expansion, and 10 states have not.

<sup>5</sup> CRS review of Medicaid waiver special terms and conditions posted on the Centers for Medicare & Medicaid Services (CMS) website as of August 21, 2025, reveals four, non-ACA Medicaid expansion states with operational demonstration waivers that potentially include “applicable individuals” who might be subject to the Medicaid community engagement requirement. The four states are Georgia, Tennessee, Texas, and Wisconsin. CMS’s implementation of this provision may not result in the same list of states. In addition, this list does not account for waiver expirations that may occur before the provision is effective and/or future CMS waiver approvals or waiver extensions that may include “applicable individuals.”

<sup>6</sup> Section 1115 of the Social Security Act authorizes the Secretary of the Department of Health and Human Services (HHS) to waive specified requirements for several programs across HHS, including Medicaid, Temporary Assistance for Needy Families (TANF), and Child Support Enforcement (CSE). The purpose of these waivers is to permit states to conduct experimental, pilot, or demonstration projects that, in the judgment of the HHS Secretary, are likely to assist in promoting the objectives of these programs. For an overview of work requirements in prior law for SNAP participants (continued...)

P.L. 119-21 builds on an existing SNAP requirement for *Able-Bodied Adults Without Dependents* (ABAWDs). The ABAWD rule was enacted in the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (P.L. 104-193).

P.L. 119-21 both expands the population subject to the ABAWD rule and shrinks available waivers and exemptions. Prior law applied—and current law applies—to jurisdictions operating SNAP (i.e., the 50 states, District of Columbia, Guam, and the U.S. Virgin Islands).

Many low-income households participate in both Medicaid and SNAP, and most states administer Medicaid and SNAP within the same state agency.<sup>7</sup> Policymakers may compare and contrast the enacted policies to better understand how applicants, participants, and program enrollees may experience the changes, gauge whether special populations are similarly exempt from the two, and learn what may be asked of states in implementing the new laws.

This report examines the new policies together: first with an overview of their major similarities and differences, then in a detailed table examining the two programs' work requirements after the enactment of P.L. 119-21 across multiple policy aspects.

Department of Health and Human Services (HHS) and U.S. Department of Agriculture (USDA) implementation and rulemaking may affect the comparative analysis included in this report.<sup>8</sup> As of this report's publication date, HHS has begun publishing implementation guidance for P.L. 119-21, Section 71119.<sup>9</sup> USDA has begun to publish guidance for P.L. 119-21's SNAP provisions, including Section 10102.<sup>10</sup> This report does not track or compare agency implementing guidance; it is focused on the enacted text and, in the case of SNAP, the enacted text's relationship with prior law.

## Overview of the Major Similarities and Differences of the Medicaid and SNAP Requirements

The Medicaid community engagement requirement, once effective, and the expanded SNAP ABAWD rule have similarities and differences.

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and recent work-related initiatives for Medicaid enrollees, see CRS Report R48531, *Work Requirements: Existing Policies in Medicaid, SNAP, Housing Assistance, and TANF*. CRS Report R48531 does not reflect changes made by P.L. 119-21.

<sup>7</sup> See CMS, "Where Can People Get Help with Medicaid & CHIP?" <https://www.medicaid.gov/about-us/where-can-people-get-help-medicaid-chip>; Food and Nutrition Service, "SNAP State Directory of Resources," January 30, 2025, <https://www.fns.usda.gov/snap/state-directory>.

<sup>8</sup> The Medicaid community engagement provision under P.L. 119-21 requires the HHS Secretary to promulgate an implementing interim final rule (that is exempt from rulemaking requirements at 5 U.S.C. §553) no later than June 1, 2026. It is possible that CMS will release nonbinding implementing sub-regulatory guidance in advance of the required release of this interim final rule.

<sup>9</sup> For example, see CMS, *CMCS Informational Bulletin*, Section 71119 of the "Working Families Tax Cut" Legislation, P.L. 119-21: Requirements for States to Establish Medicaid Community Engagement Requirements for Certain Individuals, December 8, 2025, and CMS, *Section 71119 of "Working Families Tax Cut" Legislation*, P.L. 119-21: Requirements for States to Establish Medicaid Community Engagement Requirements for Certain Individuals, December 8, 2025. Both documents are available at <https://www.medicaid.gov/resources-for-states/working-families-tax-cut-legislation/community-engagement>.

<sup>10</sup> See Food and Nutrition Service, "One Big Beautiful Bill Act of 2025," <https://www.fns.usda.gov/obbb>.

## Population Covered

The revised SNAP requirement expands the prior law ABAWD rule so that the requirement covers all adults who are (1) not aged, disabled or pregnant and (2) without children or whose youngest child is aged 14 and older. The Medicaid community engagement requirement applies to specified adults applying for or enrolled through the ACA Medicaid expansion or to those who are described in the ACA Medicaid expansion pathway but who are eligible for or receive minimum essential coverage through a waiver.<sup>11</sup> Many such Medicaid-enrolled adults are also adults who are (1) not aged, disabled, or pregnant and (2) without children or whose youngest child is aged 14 or older.

Thus, both sets of requirements apply to the same *general* population: (1) nondisabled adults between the ages of 18 and 64 for SNAP and ages 19 and 64 for Medicaid, without dependents, and (2) parents (and others who are caring for children) between the ages of 18 and 64 (ages 19 and 64 for Medicaid) whose youngest child is aged 14 and older. As discussed in **Table 1**, some individuals in these populations may be exempted, and some of the exemptions differ between Medicaid and SNAP (e.g., the treatment of foster care youth, other child-welfare-involved populations, and veterans).

## Hours and Activities

Both Medicaid and SNAP requirements can be met with 80 hours per month of employment, and both allow a combination of employment, participation in a work program, and participation in other activities to count toward the 80-hours-per-month requirement (though the countable other activities differ).

The Medicaid community engagement requirement and the SNAP ABAWD rule both allow participation in a “work program” to count toward meeting the 80-hour-per-month requirement. Work programs under both Medicaid and SNAP include the Workforce Innovation and Opportunity Act (WIOA) adult, youth, and dislocated worker programs; the SNAP Employment and Training (SNAP E&T) program; SNAP workfare; trade adjustment assistance; and other state-operated employment and training programs.<sup>12</sup>

## Differences in Qualifying Activities

Medicaid and SNAP differ in their treatment of community service and education. The Medicaid community engagement requirement allows participants to count hours in community service and hours enrolled in an education program at least half time toward the combined total of 80 hours. The SNAP ABAWD requirement generally does not allow participants to count hours spent in an education program, unless the hours are part of a work program, and the countability of community service hours depends on the state’s policy. Separately from the SNAP ABAWD rule and P.L. 119-21’s amendments, postsecondary education students enrolled more than part time are often ineligible for SNAP.

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<sup>11</sup> *Minimum essential coverage* is defined in the statute “as described in section 5000A(f)(1)(A) of the Internal Revenue Code of 1986 and determined in accordance with standards prescribed by the Secretary in regulations.”

<sup>12</sup> In SNAP law, *work program* is defined in Section 6(o)(1) of the Food and Nutrition Act of 2008 (7 U.S.C. §2015(o)). The Medicaid community engagement provision cross-references SNAP’s definition. Though job search is an allowable component of a SNAP Employment and Training (SNAP E&T) program, job search hours do not count toward SNAP time-limit requirements.



## Special Provisions

There are special provisions for counting the earnings of seasonal workers toward meeting the Medicaid community engagement requirement that do not apply to the SNAP ABAWD rule.

The Medicaid requirement exempts a member of a household that receives SNAP and who is subject to SNAP work requirements. SNAP law does not include a similar treatment for compliance with the Medicaid community engagement requirement, though SNAP does exempt individuals that follow certain other programs' work requirements.

The Medicaid community engagement requirement is effective beginning December 31, 2026, or sooner at state option. However, states may request exemptions if they demonstrate a "good faith effort" to comply with the community engagement requirements (as defined in statute). If approved by the HHS Secretary, such exemptions expire no later than December 31, 2028, and may be terminated by the HHS Secretary earlier if states are not meeting specified actions toward compliance.

## Effective Dates and State Flexibility

The new SNAP provisions on work requirements are effective immediately, but, in practice, USDA's policy guidance requires states' implementation by November 2, 2025.<sup>13</sup> Through December 31, 2028, USDA may exempt individuals from the work requirement in Alaska and Hawaii if the state requests the exemption, the state submits information as specified by USDA, and USDA determines that the state is making a good faith effort to have individuals comply with the work requirement.

## Overlap of Medicaid Enrollment and SNAP Participation in Groups Covered by the Requirements

Since the SNAP requirement and the Medicaid community engagement requirement apply to similar populations, some individuals might be potentially affected by the requirements of both programs. If such individuals receiving both Medicaid and SNAP do not meet the associated requirements, they would be at risk of losing both benefits. However, a Medicaid enrollee is exempt from the community engagement requirement if the enrollee is a member of a household that receives SNAP and is subject to SNAP work requirements.

To understand the question of the degree of overlap of those who might be subject to work requirements in both Medicaid and SNAP, CRS used projected 2025 Medicaid enrollment and SNAP participation and their characteristics to identify two groups. The first group consists of ACA Medicaid expansion adults with no child under the age of 14. The second group consists of SNAP participants who were nondisabled adults with no child under the age of 14.<sup>14</sup> These

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<sup>13</sup> See Food and Nutrition Service "ABAWD Exceptions Implementation Memorandum," and "ABAWD Waiver Implementation Memorandum," both dated October 3, 2025, available at <https://www.fns.usda.gov/obbb>.

<sup>14</sup> For this analysis, CRS used projected data for 2025. The estimation of benefit receipt for both Medicaid enrollees and SNAP participants generally relies on data from Census Bureau household surveys. Projected data were used because recent survey data were affected by the COVID-19 pandemic and the policy responses to it. Most of the policy responses to the pandemic have expired, and thus recent historical data provide a poor baseline for examining (continued...)

estimates represent benefit receipt before the potential effects of these requirements on enrollment and participation in these programs.<sup>15</sup> They are used to show that in the population group that might be affected by work requirements, some receive benefits from both programs, but in the population grouping affected by work requirements, many persons receive benefits from one program but not the other.

**Figure 1** shows estimates of the number of ACA Medicaid expansion adults with no child under the age of 14 and SNAP participants who were non-aged (under the age of 65), nondisabled adults with no children under the age of 14 for 2025. Within these combined groups,

- 6.2 million people were both Medicaid enrollees and SNAP participants (benefit receipt from both programs);
- 12.8 million people received only Medicaid; and
- 5.7 million people received only SNAP.

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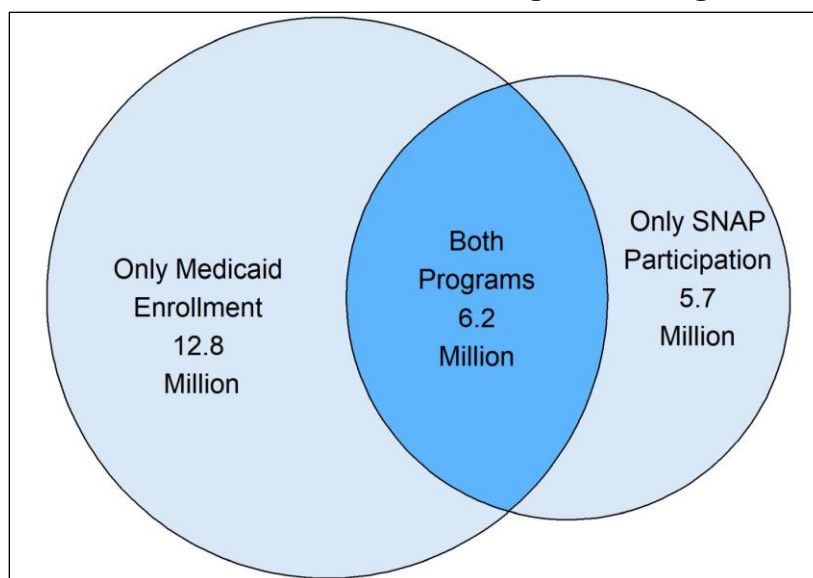
prospective policy changes. Microsimulation was used to estimate Medicaid enrollment and SNAP participation because recent survey data underreport receipt of need-tested benefits. Microsimulation is used to impute additional enrollees based on their characteristics among those simulated as eligible for Medicaid or SNAP. Data from the Census Bureau's Annual Social and Economic Supplement (ASEC) to the Current Population Survey (CPS) were modified to project the characteristics of the population, their economic circumstances, and program participation for 2025. The data were projected to reflect the characteristics of the population in 2025 by the Urban Institute, under contract with CRS and using specifications provided by CRS. The computer microsimulation was done using the Transfer Income Model (TRIM), primarily funded by HHS and maintained at the Urban Institute. The specifications provided by CRS were to project data to come as close as possible to that assumed by CBO for 2025 in its demographic, economic, and budget outlooks published in 2024.

For Medicaid, TRIM estimated the ACA expansion population. It did not estimate individuals enrolled under waivers. Some individuals in these groups might be eligible for exemptions from the new or revised requirements; however, the data used to make these estimates did not contain the detail necessary for CRS to model specific exemptions from the requirements. Hence, the estimates of the population groups include individuals who may be eligible for exemptions. Note that it was not possible to estimate pregnant individuals among ACA Medicaid expansion enrollees or SNAP participants, and therefore pregnant individuals are included in these data.

<sup>15</sup> Thus, they are not estimates of how many people would be in these population groups and applying for or enrolled in Medicaid or participating in SNAP once the new requirements are in effect. CBO has estimated that the new work requirements, and other changes made to Medicaid and SNAP in P.L. 119-21, will reduce enrollment and participation in these programs.



**Figure 1. Estimated 2025 ACA Medicaid Expansion Adult Enrollees with No Children or Youngest Child Aged 14 and Older and SNAP Participants Who Were Non-Aged, Nondisabled Adults with No Children or Youngest Child Aged 14 and Older**



**Source:** CRS estimates using the Census Bureau's Annual Social and Economic Supplement to the Current Population Survey (2016-2018 data projected to 2025) and Transfer Income Model microsimulation.

**Notes:** SNAP = Supplemental Nutrition Assistance Program. Non-aged refers to adults under the age of 65.

Although the Medicaid and SNAP requirements apply broadly to similar populations, there are differences in the eligibility rules between the two programs that mean some individuals may receive benefits under one program but not the other.

In terms of ACA Medicaid expansion adults who do not participate in SNAP, CRS estimates that young adults who report being in school compose a fairly large share of the ACA Medicaid expansion population. Under SNAP rules, many full-time college students are ineligible for benefits. (Full-time students will be exempt from the Medicaid community engagement requirement.) Additionally, within this population in 2025, an estimated 4 million ACA Medicaid expansion enrollees were eligible for SNAP but did not receive it. One explanation may be that adults without dependent children often qualify for relatively small SNAP benefits and therefore may choose not to participate.

In terms of SNAP participants who were not enrolled in Medicaid, some who received SNAP were ineligible for Medicaid because they lived in a state that opted not to expand eligibility under the ACA Medicaid expansion. Additionally, in many states, people are eligible for SNAP benefits if they live in households with incomes as high as 200% of the federal poverty level (FPL). The upper income-eligibility threshold associated with the ACA Medicaid expansion population, on the other hand, is 133% of the FPL (or 138% of the FPL with the application of a standard 5-percentage-point-of-FPL income disregard). This difference in income thresholds helps explain why some individuals who receive SNAP do not receive Medicaid.

## Detailed Comparison of the Provisions

**Table 1** compares Medicaid and SNAP work requirements across a number of elements, including applicable geographic areas, populations subject to and exempt from the requirements, activities that meet the requirements, treatment of high areas of unemployment, consequences for

not meeting requirements, and funding for employment programs and/or implementation. **Table 1** does not capture every aspect of the Medicaid community engagement requirement or of the expanded work requirements for SNAP as enacted under P.L. 119-21 but rather captures key requirements across both programs.

Because SNAP has preexisting statutory and regulatory work requirements, the comparable SNAP policies reflected in **Table 1** may be derived from three sources: (1) prior law as revised by P.L. 119-21, (2) provisions newly enacted in P.L. 119-21, and (3) prior law where P.L. 119-21 made no changes. In contrast, the Medicaid community engagement requirement is only in the new law. When a SNAP element in the table refers only to preexisting law, it means P.L. 119-21 did not change or address this provision. SNAP regulatory references in **Table 1** refer to regulations existing prior to any rulemaking implementing P.L. 119-21, and these provisions may change under new regulations.

**Table I. Comparison of Medicaid Community Engagement Requirement and SNAP Work Requirements**

(as added or amended by P.L. 119-21)

Element	Medicaid Community Engagement Requirement (P.L. 119-21, §71119)	SNAP Work Requirements (Food and Nutrition Act of 2008 [FNA], §6(o), as amended by P.L. 119-21, §10102, unless otherwise noted)
General Description	<p>Requires specified nonpregnant, nondisabled adults, aged 19 through 64, who are eligible for (or are enrolled under) (1) the ACA Medicaid expansion pathway or (2) a waiver that provides minimum essential health coverage (i.e., “applicable individuals” as defined therein) in the 50 states and the District of Columbia, to complete a minimum of 80 hours of qualifying community engagement activities for one month (or up to three consecutive months at state option) prior to an initial application as a condition of Medicaid eligibility. Qualifying community engagement activities include work, participation in a work program or community service, or enrollment in an education program.</p> <p>Current Medicaid enrollees who meet the definition of “applicable individuals” must demonstrate compliance with the community engagement requirements for one month, or for more months (whether or not consecutive) as specified by the state, as a condition of continued coverage.</p> <p>The provision is effective beginning December 31, 2026, or sooner at state option. The HHS Secretary is prohibited from waiving these requirements under the Medicaid Section 1115 demonstration waiver authority.</p>	<p>Preexisting law provides that certain SNAP participants aged 16 to 59 be required to register for work (e.g., fill out a form or have nonexempt status noted in a case file), be prohibited from voluntarily quitting jobs or reducing hours, and, if required by the state, must participate in the SNAP Employment and Training (SNAP E&amp;T) program. Some participants are exempt from these “general work requirements” (FNA, §6(d)). P.L. 119-21 did not amend the general work requirements.</p> <p>For “able-bodied adults without dependents” aged 18 to 54, prior law limits benefits to 3 months in a 36-month period if the individual is not working or participating in activities at least 80 hours per month. P.L. 119-21 extends the time limit to (1) adults aged 55 to 64 and (2) families in which the youngest child is aged 14 or older. (Hereinafter, the “3 months in a 36-month” period will be referred to as the “three-month time limit.”) Descriptions below refer to the time limit, not general work requirements.</p>

Element	Medicaid Community Engagement Requirement (P.L. 119-21, §71119)	SNAP Work Requirements (Food and Nutrition Act of 2008 [FNA], §6(o), as amended by P.L. 119-21, §10102, unless otherwise noted)
Geographic Coverage of Work Requirement	<p>Applies to “applicable individuals” in the 50 states and District of Columbia who have adopted ACA Medicaid expansion or have CMS approval for a waiver that provides minimum essential health coverage to such individuals. The new community engagement requirement does not apply to</p> <ul style="list-style-type: none"> <li>American Samoa,</li> <li>Guam,</li> <li>the Commonwealth of the Northern Mariana Islands,</li> <li>Puerto Rico, and</li> <li>the U.S. Virgin Islands.</li> </ul>	<p>Under preexisting law, work requirements apply only to the jurisdictions participating in SNAP (the 50 states, District of Columbia, Guam, and the Virgin Islands). The following territories do not operate SNAP:</p> <ul style="list-style-type: none"> <li>American Samoa,</li> <li>the Commonwealth of the Northern Mariana Islands, or</li> <li>Puerto Rico.</li> </ul>
Exemptions from Work Requirements		
Age	Exempts individuals under the age of 19 and those aged 65 and over.	<p>Preexisting law exempts individuals aged 15 and younger and aged 60 and older from the general work requirements. P.L. 119-21 retained this exemption.</p> <p>Prior law exempted individuals aged 17 and younger and aged 55 and older from the three-month time limit. P.L. 119-21 revised this to exempt those aged 17 and younger and 65 and older.</p>
Disability	Exempts veterans with a disability rated as total under 38 U.S.C. §1155 and individuals who are medically frail or otherwise have special medical needs as defined by the HHS Secretary, including individuals who are blind or disabled (as defined in the Social Security Act [SSA] §1614) or who have a substance use disorder; a disabling mental disorder; a physical, intellectual, or developmental disability that significantly impairs their ability to perform one or more activities of daily living; or a serious or complex medical condition.	<p>Preexisting law exempts individuals medically certified as physically or mentally unfit for employment. P.L. 119-21 retained this exemption. Current regulation, among other specifications, indicates that this includes an individual “receiving temporary or permanent disability benefits issued by governmental or private sources.” (7 C.F.R. §273.24(c)(2))</p>
Pregnancy	Exempts individuals who are pregnant or entitled to Medicaid postpartum care.	Preexisting law exempts pregnant women from the three-month time limit.
Age of Youngest Child	Exempts parents, guardians, caretaker relatives, or family caregivers of a dependent child under the age of 14.	Prior law exempted all adults caring for dependent children. P.L. 119-21 exempts parents or other household members caring for a child under the age of 14.

Element	Medicaid Community Engagement Requirement (P.L. 119-21, §71119)	SNAP Work Requirements
		(Food and Nutrition Act of 2008 [FNA], §6(o), as amended by P.L. 119-21, §10102, unless otherwise noted)
Caring for a Disabled Person	Exempts parents, guardians, caretaker relatives, or family caregivers of a disabled individual.	Under preexisting law, an individual who is responsible for the care of a disabled individual is exempt from the three-month time limit based on an exemption from the general work requirements.
Engaged in Educational Activities	No provision. Educational activities do not exempt “applicable individuals” from the community engagement requirement but could count toward meeting the hours requirement.	Preexisting law exempts a student who is enrolled at least half time in a recognized school or institution of higher education. Separate from the time limit, such higher education students are subject to different eligibility restrictions not amended by P.L. 119-21.
Meeting Other Programs’ Work-Related Requirements		
Unemployment Compensation	No provision.	Preexisting law (FNA, §6(d)) exempts an individual complying with a work registration requirement of the federal-state unemployment compensation system. <sup>a</sup>
Temporary Assistance for Needy Families (TANF)	Exempts individuals who are in compliance with any state requirements imposed pursuant to SSA §407. <sup>b</sup>	Preexisting law (FNA, §6(d)) exempts an individual complying with TANF work registration requirements. <sup>a</sup> (No such requirement exists in TANF.) Current regulations exempt an individual complying with any TANF work requirement. (7 C.F.R. §273.7(b)(1)(iii))
SNAP	Exempts a member of a household that receives SNAP and who is subject to SNAP work requirements.	Not applicable.
Medicaid	Not applicable.	No provision.
Substance Abuse Treatment	Exempts individuals with a substance use disorder and those who are participating in a drug addiction or alcoholic treatment and rehabilitation program (as defined under FNA, §3(h)).	Prior law (FNA, §6(d)) exempts a regular participant in a drug addiction or alcohol treatment and rehabilitation program, as defined under FNA §3(h). <sup>a</sup>
Other Exemptions		
Medicare Enrollees	Exempts individuals entitled to or enrolled in Medicare Part A or enrolled in Medicare Part B.	No provision.

Element	Medicaid Community Engagement Requirement (P.L. 119-21, §71119)	SNAP Work Requirements (Food and Nutrition Act of 2008 [FNA], §6(o), as amended by P.L. 119-21, §10102, unless otherwise noted)
Foster Youth	Exempts those enrolled through Medicaid’s mandatory child-welfare-related eligibility pathways as well as those eligible through the mandatory foster-care-youth-through-age-26 eligibility pathway.	Prior law exempted from the three-month time limit former foster youth aged 24 and younger who had been in foster care on their 18 <sup>th</sup> birthday (as defined by P.L. 118-5, §311(a)), with a September 30, 2030, sunset date. P.L. 119-21 struck this exemption.
Veterans	Exempts veterans with a disability rated as “total” under 38 U.S.C. §1155.	Prior law exempted veterans, without regard to disability status, from the three-month time limit, with a September 30, 2030, sunset date. P.L. 119-21 struck this exemption.
Homeless Individuals	No provision.	Prior law exempted homeless individuals from the three-month time limit, with a September 30, 2030, sunset date. P.L. 119-21 struck this exemption.
Certain American Indians	Exempts Indians, Urban Indians, California Indians, and other Indians who are eligible for the Indian Health Service as determined by the HHS Secretary through regulations.	Prior law had no exemption. P.L. 119-21 exempts Indians, Urban Indians, and California Indians, as defined in cross-referenced statutes.
Incarcerated Individuals	Exempts inmates in a public institution or individuals who were inmates in a public institution at any point during the three-month period prior to the month where compliance with community engagement activities is being verified.	Under preexisting law, individuals are ineligible to receive SNAP benefits while incarcerated. (FNA, §3(n))
Other Medicaid-Specific Exemptions	Exempts individuals described in one of Medicaid’s mandatory eligibility categories (with the exception of those served under the ACA Medicaid expansion).	Not applicable.
Hours Needed to Meet the Requirement	Requires 80 hours in a month, as specified.	Preexisting statutory requirement is 20 hours per week (averaged monthly), implemented in current regulations as 80 hours in a month.
Activities That Meet the Requirement and Their Definitions	“Qualifying individuals” must meet one or more of the four qualifying activities (i.e., work, specified work programs, community service, and/or enrollment in an education program at least half time) for a combined total of at least 80 hours per month; have a monthly income “that is not less than the applicable minimum wage requirement under section 6 of the Fair Labor Standards Act of 1938, multiplied by 80 hours”; or meet the special rules for seasonal employees (described below).	Under preexisting law, individuals subject to the three-month time limit can meet the hours required with work, specified work programs, volunteering (under state rules), or a combination of these.

Element	Medicaid Community Engagement Requirement (P.L. 119-21, §71119)	SNAP Work Requirements (Food and Nutrition Act of 2008 [FNA], §6(o), as amended by P.L. 119-21, §10102, unless otherwise noted)
Employment	Work is included as one of the four qualifying activities. Neither <i>work</i> nor <i>employment</i> are defined in P.L. 119-21.	<i>Working</i> is defined in regulations as work in exchange for money, work in exchange for goods or services, and unpaid work under standards defined by the state. (7 C.F.R. §273.24(a)(2))
Employment Services or Training	Participation in a work program is one of the four qualifying activities. <i>Work program</i> is defined in FNA, §6(o)(1). See SNAP column.	<p>Under preexisting law, hours participating in a specified work program count toward the 80-hour-per-month requirement. The specified work programs are as follows:</p> <ul style="list-style-type: none"> <li>• SNAP E&amp;T;</li> <li>• SNAP workfare;</li> <li>• other employment and training programs operated by states and localities;</li> <li>• Workforce Innovation and Opportunity Act (WIOA) Title I programs, youth activities (for those up to the age of 24), adult activities, and dislocated worker activities;</li> <li>• employment program under trade adjustment assistance; or</li> <li>• veterans program operated by the Department of Labor or Department of Veterans Affairs.</li> </ul> <p>(Hours in either supervised job search or job search training that is under either the SNAP E&amp;T program or a state or local employment and training program generally are not countable toward the 80-hour requirement. However, if job search, supervised or otherwise, is a subsidiary part of another SNAP E&amp;T component, hours in such job search may be counted as long as they do not exceed 40 of the 80-hour requirement. [7 C.F.R. 273.24(a)(3)(iii)] Hours of job search in WIOA programs, trade adjustment assistance programs, and veterans' programs are countable. SNAP E&amp;T work experience and workfare hours are limited to the household's SNAP allotment divided by the applicable federal or state minimum wage. [FNA, §6(d)(4)(F)])</p>
Volunteer Activities	Community service is one of the four qualifying activities. The term <i>community service</i> is not defined in P.L. 119-21.	Not explicitly countable in preexisting law, though regulations allow for unpaid work under standards set by the state. (7 C.F.R. §273.24(a))



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Education Activities	Enrollment in an education program at least half time is one of the four qualifying activities. Educational programs include an institution of higher education (as defined in the Higher Education Act of 1965, §101) and a program of career and technical education (as defined in the Carl D. Perkins Career and Technical Education Act of 2006, §3).	In preexisting law, education hours that are not part of specified work programs do not count toward the time-limit requirements. Under a separate preexisting provision, students attending higher education more than half time are not eligible for SNAP benefits unless they meet an exception.
Requirements for New Applicants vs. Existing Enrollees/Participants		
New Applicants	Requires “applicable individuals” to meet 80 hours for one month (or up to a total of three consecutive months at state option) immediately preceding application.	Under preexisting law, new applicants are subject to the 3-month time limit but do not immediately lose benefits because they are eligible for at least 3 months of assistance in a 36-month period.
Existing Enrollees or Participants	Requires “applicable individuals” to meet 80 hours for one month or for more months (whether or not consecutive), as specified by the state, as a condition of continued coverage.	Under preexisting law, recertifying applicants continue to be subject to the three-month time limit unless exempt.
Special Rule for Seasonal Employees	Qualifying individuals who are seasonal employees (as defined in the tax code) may meet the community engagement requirement if they have an average monthly income over the preceding six months “that is not less than the applicable minimum wage requirement under section 6 of the Fair Labor Standards Act of 1938 multiplied by 80 hours.”	No provision.
Treatment of Individuals in Areas of High Unemployment	Permits states to request, and the HHS Secretary to approve, an exemption from community engagement requirements for “applicable individuals” who live in a county (or equivalent unit of local government) with an unemployment rate that is at or above the lesser of 8% or 1.5 times the national unemployment rate.	Prior law allows states to submit to the Secretary of Agriculture waivers of the three-month time limit in areas that exceed 10% unemployment or areas that lack sufficient jobs (defined further in regulations to include a variety of grounds for waiver). P.L. 119-21 limits states’ eligibility for waivers to areas with an unemployment rate exceeding 10% and areas of noncontiguous states (Alaska and Hawaii) with unemployment rates 1.5 times the national unemployment rate.

Element	Medicaid Community Engagement Requirement (P.L. 119-21, §71119)	SNAP Work Requirements (Food and Nutrition Act of 2008 [FNA], §6(o), as amended by P.L. 119-21, §10102, unless otherwise noted)
Dedicated Funding for Employment Services	No provision.	Under preexisting law, SNAP has dedicated E&T funding. SNAP law provides separate funding for state-run E&T. Federal funding for SNAP E&T is in three parts: (1) \$103 million allocated among the states according to formula; (2) \$20 million allocated among states that pledge to provide services to all individuals at risk of losing benefits due to time limit; (3) a 50% federal match on state expenditures, including the provision of supportive services such as transportation and child care. (FNA, §16(h))
Good Cause or Other Criteria Allowed for Individual Noncompliance	Permits states to approve (in accordance with standards specified by the HHS Secretary) a “short-term hardship event” to exempt applicable individuals from the community engagement requirement for short-term hardships during a month and deem such individuals as having demonstrated the community engagement requirements under this provision. <i>Short-term hardships</i> are defined as, for all or part of the month, (1) the requesting individual “receives inpatient hospital services, nursing facility services, services in an intermediate care facility for individuals with intellectual disabilities, inpatient psychiatric hospital services, or other services of similar acuity” (including outpatient care) as determined by the HHS Secretary; (2) the requesting individual or their dependent has to travel outside of their community for medically necessary care that is not available within their community; (3) the individual resides in an area where the President has declared an emergency or disaster pursuant to the National Emergencies Act or the Robert T. Stafford Disaster Relief and Emergency Assistance Act; or (4) the individual resides in a place with a high unemployment rate, as defined (see “Treatment for high unemployment” above).	Under current regulation, as determined by the state agency, an individual who would have fulfilled the work requirement but missed some hours with good cause is considered to have fulfilled the requirement. Good cause includes circumstances beyond an individual’s control, such as illness, illness of another household member, or transportation difficulties. (7 C.F.R. §273(b)(2))  Under preexisting law, states enforcing the time limit earn discretionary exemptions, which they may use to provide a time-limited individual an additional month or months of benefits.
Consequences for Not Meeting the Requirement	Denial of eligibility or disenrollment for noncompliance (after a noncompliance period, as specified). However, such individuals are still deemed Medicaid-eligible under the ACA’s screen-and-enroll requirement, which make those individuals ineligible for federal subsidies to purchase coverage through the health insurance exchanges.	Under preexisting law, loss of SNAP food assistance for the individual. Under general work requirements, states may opt to require participation in SNAP E&T and may opt to suspend benefits to the household for a period of time. (FNA, §6(d)) <sup>a</sup>

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Process for Regaining Eligibility	States are required to provide individuals with a notice of noncompliance that includes information on (1) how the individual may make a satisfactory showing of compliance or exemption from the Medicaid community engagement provision and (2) how to reapply for Medicaid after being denied eligibility or disenrolled from the program.	Preexisting law includes a process for regaining SNAP eligibility if the individual denied eligibility due to the three-month time limit subsequently meets listed requirements for any 30 consecutive days.
State Verification Requirements	Requires states to verify compliance with or exclusion from the community engagement requirement when determining eligibility, or at the enrollee's regularly scheduled eligibility redetermination, or more frequently at state option. Requires states to establish processes and use reliable information available to the state (such as payroll data or Medicaid encounter data) without requiring, where possible, the applicable individual to submit additional information.	No statutory provision. For individuals subject to the three-month time limit, regulations require that work hours be verified at recertification (7 C.F.R. §273.2(f)), and exceptions to the time limit are to be verified if questionable (7 C.F.R. §273.24(l)). States are required to use "documentary evidence" as primary sources of verification of a household's circumstances. Documentary evidence includes pay stubs. The state agency is required to do additional verification for those subject to the three-month time limit, verifying hours. Regulations also require states to verify any questionable information. (7 C.F.R. §273.2(f))
Requirements and Processes for Noncompliant Individuals	Where noncompliance is found, or if the state is unable to determine compliance, the state is required to provide notice of noncompliance. Within 30 days from the date the notice is received, the individual must demonstrate compliance with the requirement or that he or she does not meet the definition of "applicable individual." The individual will be able to receive federal Medicaid reimbursement for health care services provided during this period. After 30 days, if the noncompliance has not been resolved, the state must provide timely and adequate written notice (as specified) and, subject to specified requirements, deny or terminate eligibility not later than the end of the month following the month that the initial 30-day period ends.	No statutory provision. (Individuals who have received benefits for 3 of 36 months without the required work or participation in a work program are disqualified for SNAP eligibility (7 C.F.R. §273.24(b)).) Under current regulations, the state agency must send a "Notice of Adverse Action" at least 10 days prior to the disqualification, which is to include the household's right to a fair hearing. (7 C.F.R. §273.13(a))

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Outreach and Enrollee Education Requirements	Requires states to notify individuals who are subject to the Medicaid community engagement requirements at least three months before the requirement becomes effective and periodically thereafter by mail, electronic format, and one or more additional methods, including telephone, text message, website, or other available electronic means. Enrollee education includes information on who is impacted, how to comply, how to report compliance, and consequences for noncompliance.	No statutory provision. Under current regulations, states must provide a written notice and oral explanation to the household of all applicable work requirements for all members of the household and identify which household member is subject to which work requirement. (7 C.F.R. §273.7(c)(1))
Implementation	In general, the Medicaid community engagement requirements apply beginning December 31, 2026, or sooner at state option.  However, states may request (and the HHS Secretary may approve) exemptions for states that demonstrate a good faith effort to comply with the community engagement requirements (as specified). Such exemptions expire no later than December 31, 2028, and may be terminated by the HHS Secretary earlier for states that are not meeting specified actions toward compliance.	Section 10102 is effective upon enactment, but, in practice, USDA's policy guidance requires states' implementation by November 2, 2025.  Through December 31, 2028, the Secretary of Agriculture may exempt individuals from the work requirement in Alaska and Hawaii if the state requests the exemption, the state submits information as specified by the Secretary, and the Secretary determines that the state is making a good faith effort to have individuals comply with the work requirement.
Rulemaking Timeline	The HHS Secretary is required to promulgate an implementing interim final rule (that is exempt from rule-making requirements at 5 U.S.C. §553) no later than June 1, 2026.	No provision.

Element	Medicaid Community Engagement Requirement (P.L. 119-21, §71119)	SNAP Work Requirements (Food and Nutrition Act of 2008 [FNA], §6(o), as amended by P.L. 119-21, §10102, unless otherwise noted)
Implementation Funding to States	<p>For FY2026, appropriates \$100 million for the HHS Secretary to award grants to states (defined as states and the District of Columbia) to establish systems necessary to carry out the community engagement requirements as well as other provisions in P.L. 119-21 that pertain to eligibility determinations or redeterminations. States will be awarded a share of these funds based on the ratio of the total number of “applicable individuals” residing in the state compared to the total number of “applicable individuals” residing in all states, as of March 31, 2025. Such funds shall remain available until expended.</p> <p>The provision appropriates an additional \$100 million for FY2026 for the HHS Secretary to award grants to states (defined as states and the District of Columbia) for the same purpose. Such funds will be distributed evenly among the 50 states and the District of Columbia and shall remain available until expended.</p>	<p>There is no new funding for states explicitly provided by P.L. 119-21. Under prior law, state implementation costs are shared 50/50 between USDA and the states. P.L. 119-21’s amendments to administrative cost-matching requirements reduce federal funding for states’ administrative costs, requiring states to provide 75% beginning in FY2027.</p>
Implementation Funding to Federal Agency	<p>For FY2026, appropriates \$200 million to the CMS Administrator to carry out this provision. Such funds shall remain available until expended.</p>	<p>No explicit implementation funding for USDA is included in P.L. 119-21.</p>

**Source:** CRS review of P.L. 119-21 and applicable statutory and regulatory provisions. Under prior and preexisting law, Supplemental Nutrition Assistance Program (SNAP) work provisions are at Sections 6(d)(1) and 6(o) of the Food and Nutrition Act of 2008 (FNA). SNAP regulations as noted in the table.

**Notes:** The table does not capture every aspect of the Medicaid community engagement requirement or of the expanded work requirements for SNAP as enacted under P.L. 119-21 but rather captures key requirements across both programs.

ACA = Affordable Care Act; HHS = Department of Health and Human Services, CMS = Centers for Medicare & Medicaid Services; USDA = U.S. Department of Agriculture.

- a. Because P.L. 119-21 did not amend Section 6(d) of the FNA, it is possible to interpret this requirement as not applying to 60- to 65-year-olds.
- b. Section 407 of the Social Security Act is a performance standard that states, not individuals, must meet. While states may require work or engagement to help meet the standard, states determine the requirements that apply directly to individuals, not the rules of Section 407. Accordingly, this exemption would be subject to interpretation.

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