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Work Requirements: Medicaid, the Supplemental Nutrition Assistance Program (SNAP), Rental Assistance, and Temporary Assistance for Needy Families (TANF)

Meeting health care and financial needs while preserving incentives to work is a central tension in policies related to low-income assistance. Policies to promote work vary across Medicaid, the Supplemental Nutrition Assistance Program (SNAP), housing assistance, and cash aid from the Temporary Assistance for Needy Families (TANF) block grant. The policies differ based on the program history; the nature and design of the particular program; whether or not it has dedicated funding for employment services, education, and training; and other factors.

Medicaid

The FY2025 budget reconciliation law (P.L. 119-21) established a “community engagement requirement” whereby specified adults—those who are nonpregnant, nondisabled, and aged 19 through 64—in the 50 states and the District of Columbia must complete a minimum of 80 hours of qualifying activities (i.e., work, participation in a work program or community service, or enrollment in an education program) as a condition of Medicaid eligibility and continued coverage. Medicaid has no dedicated employment and training dollars (or associated work program), and thus nonemployed individuals subject to these requirements need to participate in other programs (e.g., Workforce Innovation and Opportunity Act programs) to have hours in a work program counted toward the 80 hours.

SNAP

SNAP has several work-related requirements. Its strictest requirement is a time limit applying to nondisabled adults aged 18 to 64 either without dependents or whose youngest child is age 14 or older. Such participants are limited to receiving SNAP for 3 months in a 36-month period if they do not work or participate in a work program at least 80 hours per month. SNAP has dedicated Employment and Training (E&T) funding for states to design and implement programs. States may impose an E&T participation requirement for certain SNAP recipients.

Rental Assistance

Among federal rental assistance programs, public housing is the only one with a federal community engagement requirement. CRS estimates that more than 80% of those in public housing were exempt from the requirement in 2023 because they were working, due to their age or disability

status, or because they were receiving a welfare benefit and were in compliance with those program requirements. Also, some communities participate in a waiver program under which they can adopt local work requirement policies applicable to their rental assistance programs. On March 2, 2026, HUD published in the *Federal Register* a proposed rule that would allow a broader set of program administrators to develop their own work requirement and time limit policies—within broad federal guidelines—applicable to rental assistance program participants. The President’s FY2027 budget request proposed permitting the Secretary of the U.S. Department of Housing and Urban Development to require adoption of such policies.

TANF

TANF is a block grant to the states. Most work-related requirements apply to states rather than individual recipients. States must meet numerical work participation standards with respect to needy families receiving cash assistance funded by the block grant. States that fail to meet these standards are at risk of a penalty that reduces the state’s block grant. States determine the requirements that apply to individual recipients and are generally free to determine what is required and the sanction for an individual’s failure to comply. States may meet the numerical work participation standards by reducing the number of families receiving assistance, having adult assistance recipients in unsubsidized employment, or providing employment services, education, and training to nonemployed assistance recipients. In general, states have met TANF standards through caseload reduction and by continuing assistance for employed parents by utilizing earnings disregards and earnings supplement programs. TANF funds may be used to provide employment and training services.

Table 1 summarizes the work-related requirements across the four major assistance programs.

Additional Resources

CRS Report R48755, *Work Requirements: Comparison of Medicaid and Supplemental Nutrition Assistance Program (SNAP) After P.L. 119-21*.

CRS Report R48827, *Work Requirements: The Temporary Assistance for Needy Families (TANF) Work Standard and How States Met It*.

Table I. Summary of Work and Work-Related Requirements in Medicaid, SNAP, Rental Assistance, and TANF

Element	Medicaid	SNAP	Rental Assistance	TANF
Type of benefit	Financing for primary and acute medical services as well as long-term services and supports.	Benefits redeemable for food.	Below-market rent either through a rental voucher or a subsidized apartment.	Cash (work requirements apply to ongoing cash assistance recipients, though TANF may be used for other benefits and services).
Type of requirement	“Community engagement requirement” that applies to certain applicants and enrollees.	Requirements that apply to nonexempt SNAP recipients.	Requirements that apply to nonexempt individuals in the public housing program.	A numerical <i>performance measure</i> that applies to state governments, not individual recipients. States decide what requirements apply to individuals.
Population subject to the requirement (with exceptions specified by statute)	Certain nonpregnant, nondisabled adults aged 19 through 64 eligible or enrolled under the ACA Medicaid expansion or a comparable waiver who have no dependent children or their youngest child is aged 14 or older.	General work requirements apply to nondisabled adults aged 16 to 59. A time limit for those not working or in a work program applies to nondisabled adults aged 18 to 64 who have no dependent children or their youngest child is age 14 or older.	Nonelderly, nondisabled, nonworking adult public housing residents.	TANF assistance recipients who are either adults (age 18 or older) or are minor heads of households. Single parents with a child under age 1 may be disregarded when determining whether a state met its standard.
Main requirements	Nonexempt individuals must work, participate in a work program, be enrolled at least half time in an education program, or volunteer for a combined total of at least 80 hours per month.	Nonexempt individuals must register for work (general work requirement). Participants subject to the time limit may receive SNAP for 3 months in a 36-month period unless they are working or in a work program for 80 hours per month. States may require participation in E&T programs for other recipients.	Generally, nonelderly, nondisabled, nonworking adult public housing residents must complete eight hours per month of economic self-sufficiency or community service activities. Recipients of other welfare program benefits who are in compliance with those program requirements are also exempt.	States may meet numerical participation standards through reducing the number of families receiving assistance, assisting employed parents and caretakers, or engaging nonemployed recipients in activities. Minimum hours of either work or being engaged in activities vary by family type.
Funded employment services	No	Yes	No	Yes
Sanction for noncompliance	Individuals denied eligibility or disenrolled.	Loss of SNAP benefits for noncomplying individuals and sometimes, at state option, the household.	Nonrenewal of a public housing lease, which could result in eviction.	States are required to sanction those who refuse to work, but it is the states that determine the sanctions.

Source: CRS summary of relevant statutes and regulations, March 17, 2026.

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