

Cash Assistance and SNAP Work Requirements

December 8, 2025

General Updates

- Before we dive into the ABAWD work requirements detail and updates we wanted to provide updates on two other issues that have been getting attention:
 - SNAP eligibility change for certain immigrant status
 - Public Charge

Federal Actions Impacting SNAP

SNAP IMMIGRATION ELIGIBILITY CHANGES

H.R. 1 made changes to which immigrants are eligible for SNAP, notably removing the immediate eligibility of Refugees and Asylees to get SNAP

FNS issued guidance on 10/31 that suggested that even if a person was an LPR, if they were originally a Refugee or Asylee, they could not get SNAP

NY State joined a coalition of states in a lawsuit challenging that interpretation as unlawful.

PUBLIC CHARGE RULE

The Trump Administration has proposed a revision to the rules surrounding how to weigh whether an immigrant is a public charge.

This is a proposed rule, no changes have been made currently.

Comments on the rule are open for 30 days, the last day to comment is December 19th.

If clients have questions re: public charge, they should call the MOIA hotline and say public charge to be connected to confidential advice.

Who is subject to work requirements?

Cash Assistance (active)	SNAP General Work Requirements (active)	SNAP ABAWD (start date 3/1/26)
Between the ages of 18 and 59	Between the ages of 16 and 59	Between the ages of 18 and 64 Does not live with a child under 14 in SNAP household.

Who is exempt or excused?

Cash Assistance	SNAP General Work Requirements	SNAP ABAWD
60 years of age or older. Needed to care for an incapacitated household member. Having a physical or mental health condition that prevents participation in work activities	Already working at least 30 hrs./week or earning 30 times the federal min wage (\$7.25) or more a week (\$217.50). This equates to 13 hrs./week at NYC minimum wage of \$16.50. Unable to work due to a physical or mental limitation. Meeting work requirements for another program (TANF or unemployment compensation). Taking care of a child under 6 or an incapacitated person. Participating regularly in an alcohol/drug treatment program. Studying in school or training program at least half-time.	Exempt from the General Work Requirements. Medically certified or physically/mentally unfit for employment. Pregnant. A parent or other member of a household with responsibility for a dependent child under 14. Living in an area where the ABAWD Time Limit is waived.

How to meet work requirements?

Cash Assistance	SNAP General Work Requirements	SNAP ABAWD
Single parent/caretaker relatives: 30 hours/wk. 20 of which are required core activities*. Single parents with a child under 6: 20 hours/wk. 20 of which are required core activities*. Two-parent families: 35 hours/wk. 30 of which are required core activities*. Two-parent families with TANF-funded childcare: 55 hours/wk. 50 of which are required core activities*.	Provide information about their employment status and availability to work. Accept a suitable job if offered, unless there is a reason why they can't. Not voluntarily quit a job or choose to work less than 30 hours each week without having a good reason, such as getting sick, being discriminated against, or not getting paid. Participate in SNAP Employment & Training (E&T) if the assignment is <u>mandated</u>.	Work at least 80 hours a month Participate in a work program at least 80 hours a month. A work program could be SNAP E&T or another federal, state, or local work program. Participate in a combination of work program hours for a total of at least 80 hours a month. Participate in work experience or community service activity for the number of hours assigned each month (number of hours will depend on the amount of SNAP benefit).

*Core activities include; paid employment (including subsidized jobs), work experience, on-the-job training, job search and job readiness assistance (limited duration), community service, vocational educational training (limited to 12 months), caring for a child of a recipient in community service.

How is ABAWD being implemented?

- As of November 1, 2025, New York State is required to assess new applicants and households recertifying based upon the new ABAWD criteria.
- The implementation of ABAWD work requirements compliance will begin March 2026 as the existing NY state waiver was reinstated through February 28, 2026, based upon a judge's ruling in the Rhode Island case
- Details can be found on DSS's website:

<https://www.nyc.gov/site/hra/help/able-bodied-adults-without-dependents.page>

What is happening?

- **New SNAP Applicants and Recertifying Households not currently identified as ABAWD**
 - During the application or recertification interview individuals are assessed by the new ABAWD criteria. During the interview we also determine if the individual meets any of the exemption criteria.
 - If an individual identifies a medical or mental health barrier to complying with the ABAWD requirements they are instructed to have their clinical provider complete this [Medical Statement Form](#) and return it to HRA via ACCESS HRA app, mail, fax or by dropping off at an HRA Center.
 - Individuals who do not have a clinical provider to complete the medical statement form and indicate a potential barrier to compliance will be referred to a HRA WeCare provider for further assessment

ABAWD Medical Statement Form



Able Bodied Adult Without Dependents (ABAWD) Medical Statement

Client/Patient Information

Client/Patient Name: _____
Address: _____
Case #: _____ CIN: _____ D.O.B.: _____

Client/Patient Authorization

I authorize the release of medical information and/or documentation of participation in a substance use rehabilitation program requested to the Department of Social Services. I understand that this information will be treated as confidential.

Client Signature _____ Date _____

Health Care Professionals:

The person named above requests verification of their health condition or program participation. Please fill out this form and return it, signed and completed, to the individual. They have been provided instructions on how to return the form to the Department of Social Services.

Please answer any of the questions below that apply. Please sign and date this form. Include your profession or position in your organization. *

1) Is this person pregnant? ☐ Yes ☐ No ☐ Unknown ☐ N/A
If yes, due date: ____/____/____

2) Is this person participating in a substance use treatment, rehabilitation, or counseling program? ☐ Yes ☐ No

If yes, what is the expected program end date: ____/____/____

3) Does this person have a temporary or permanent mental and/or physical health condition, which limits their ability to work 20 or more hours each week (80 hours monthly)?
☐ Yes ☐ No

If yes, please state the time frame the person will not be able to work 20 or more hours a week (80 hours monthly) because of this condition:

☐ less than 30 days ☐ 1-3 months ☐ 4-6 months
☐ 6-12 months ☐ more than 12 months/or indefinitely

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Human Resources Administration
Family Independence Administration

Able Bodied Adult Without Dependents (ABAWD) Medical Statement (continued)

I certify that the information provided on the previous page is true and accurate.

Name (please print) _____ Title/Profession * _____

Address _____

Telephone Number _____

Signature _____ Date form signed ____/____/____

* This form may be signed by any of the following: physician, physician's assistant, nurse practitioner, osteopath, licensed or certified psychologist, substance use counselor, certified mental health counselor, licensed independent clinical social worker, licensed certified social worker, and certified midwife. For purposes of verifying a person's participation in a rehab or counseling program (Question #2), the director of the program or the individual's counselor may also sign this statement.

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Human Resources Administration
Family Independence Administration

Health Care Professionals:

You can help adults with disabilities or conditions keep their Supplemental Nutrition Assistance Program (SNAP) benefits

SNAP benefits (formerly food stamps) allow people with low incomes to buy the food they need. Many SNAP recipients aged 18 to 64 who do not live with a child under 14 in the SNAP household are at risk of losing their SNAP benefits due to a SNAP rule referred to as Able-Bodied Adult Without Dependents (ABAWD) time limit. This rule restricts SNAP eligibility to three months unless the person is working or participating in certain work activities for at least 20 hours per week.

With just a few minutes of your time, you can easily help.

A person who cannot work 20 or more hours a week because of a physical or mental health issue is not considered an ABAWD.

Frequently Asked Questions:

What is the definition of someone who is physically or mentally "unfit for work" under the ABAWD rule?

Being determined physically or mentally unfit for work is a broader exemption than being disabled. A person is considered physically or mentally unfit for work if they have an illness, injury, or some other mental or physical limitation, whether temporary or permanent, that does not allow them to work at least 20 hours per week as required pursuant to federal ABAWD time limit rules. Some patients have mental or physical health conditions that prevent them from working altogether; others have conditions that allow them to work but they may not be able to work full time, or even 20 hours per week. This standard is much less strict than the Social Security standard for disability and does not require a specific diagnosis.

How do I verify that my patient is "physically or mentally unfit for work" based on their condition?

Fill out the two-sided ABAWD Medical Statement Form. Include the expected time frame of the condition and your signature. **A variety of healthcare professionals can sign this form** including a physician, physician's assistant, nurse practitioner, osteopath, licensed or certified psychologist, substance use counselor, certified mental health counselor, licensed independent clinical social worker, licensed certified social worker, and certified midwife. For purposes of verifying a person's participation in a rehab or counseling program (**Question #2**), the director of the program or the individual's counselor may also sign this statement.

What is happening?

- **New SNAP Applicants and Recertifying households not currently identified as ABAWD**
 - If an individual in the household is determined to be an ABAWD they are notified by HRA through the Work Activity Letter Notice outlining the requirements
 - ABAWD eligible individuals who are not meeting the requirements by working, being in school or some other way will also receive a separate notice for appointment at an HRA PACE provider to help individuals find work activities to comply
 - Even though ABAWD compliance tracking will not begin until March, it is important individuals who receive these notices attend their appointments or reach out with questions now.

What is happening?

- **Existing SNAP clients identified as ABAWD**
 - Starting the week of October 20, 2025, existing ABAWDs received the Work Activity Notice letter outlining the ABAWD requirements and were directed to contact HRA if they are working, in school or otherwise believe they meet the criteria or should be exempt. Individuals are directed to contact HRA via the SNAP On-Demand number.
 - Starting the week of October 20, 2025, existing ABAWDS also received appointment notices at an HRA PACE vendor for appointments between November 3-26, 2025
 - We will send additional reminders to ABAWDs about compliance requirements and how we can assist them over the coming months

What is going to happen?

- **Compliance**

- The first countable month where ABAWDs will need to comply with requirements will be March 2026
- Individuals are allowed 3 months of non-compliance in a defined 36-month period before benefits will be impacted. The current 36-month period goes through September 30, 2026, and will then start a new 36-month period
- Individuals will receive non-compliance notices from HRA for months where they don't meet the requirements
- The first possible month where individuals would have benefits impacted is June 2026

How can CBOs support individuals?

- HRA has developed two opportunities for CBOs to provide qualifying community service/volunteer opportunities to individuals required to comply with work requirements

CBO Partnership Pathways

- Community Service Provider (CSP)
 - Formally vetted providers that receive assigned referrals from HRA
 - Support structured activities that fulfill engagement and compliance requirements
 - Managed in coordination with PACE Career Services Providers
- Self-Enrolled Voluntary Service Provider (SEVSP)
 - Voluntary, skill-building activities that clients may choose independently
 - Activities can fulfill compliance-driven requirements
 - Ideal for providers offering flexible or supplemental opportunities

How can CBOs support individuals?

How will this work?

- HRA will be releasing a web-based Community-Based Organization Partnership Inquiry Form that will be posted on our website and shared through our Community Outreach communications where interested CBOs can submit required information on their organization and opportunities available for vetting
- HRA will review the information and determine if the organization can be authorized as a CSP or SEVSP site or if additional information is needed
- Organizations will be informed of HRA's decision and next steps to complete the process. CSP sites will need to sign a standard MOU with HRA. SEVSP sites will not require an MOU
- We anticipate releasing the Community-Based Organization Partnership Inquiry Form this week. HRA review will likely take several weeks depending on the interest from CBOs and volume of submissions

Thank You

Questions?