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Blueprinting SNAP Work Requirements

Our takeaways from our new service blueprint that tracks how work requirement policy impacts the process of applying for, determining, and maintaining eligibility for SNAP benefits

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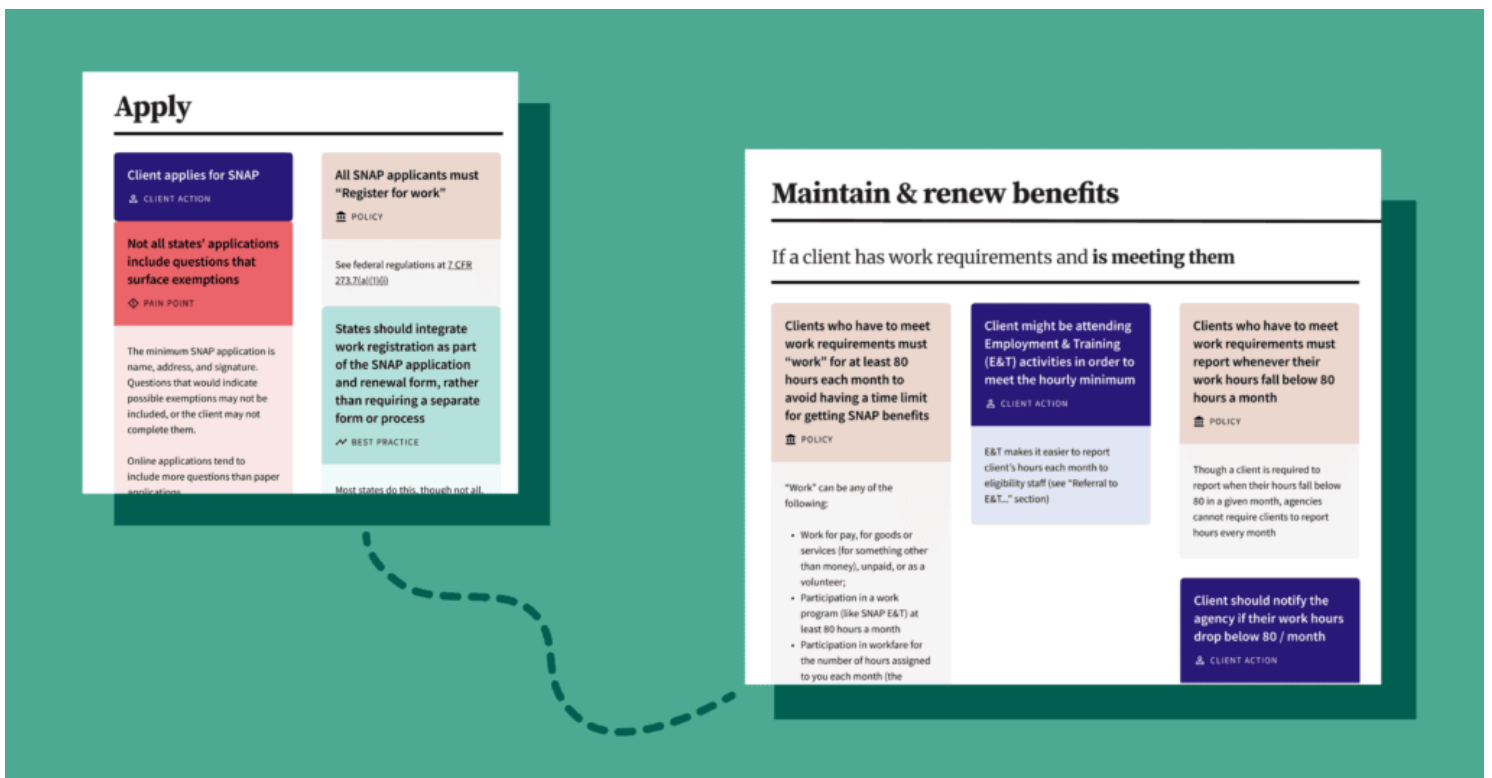Design Manager / UX Service Area
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As a result of the passage of H.R. 1, millions more adults who use the Supplemental Nutrition Assistance Program (SNAP) will now be required to report that they are doing 80 hours each month of work or qualifying work program activities in order to keep getting food assistance. Over the past few months, Code for America interviewed SNAP staff in several states about how they currently implement SNAP work requirements to identify effective strategies for reducing the harm of these changes and document common pain points for participants and state workers. We synthesized our learnings into a service blueprint of how work requirement policy impacts the process of applying for, determining, and maintaining eligibility for SNAP benefits.

While guidance and regulations continue to be released, this blueprint highlights many critical opportunities to ease the client and staff experience of work reporting requirements. States can and should prepare now to limit the

Service Blueprint for Work Requirements in SNAP Eligibility

Service blueprints are a valuable visual tool used in human-centered design to understand how a service is currently being delivered. A service blueprint maps out each step of the process: what actions clients and staff take, and what tools and systems are used. We leverage blueprints to locate pain points and opportunity areas along a service journey and to serve as a starting point to discuss where to prioritize improvements, anchoring people in shared understanding.

Check out the blueprint on Figma, or download to print in two different sizes (8.5" x 11") or (11" x 17").

Here are three recommendations for SNAP agencies to set themselves up for a successful, human-centered work requirement implementation:

1. Identify people who will newly need to meet SNAP work requirements and provide them with focused support at application and renewal

Millions of additional people will now need to comply with paperwork requirements in order to demonstrate that they are either finding enough work hours to meet SNAP's rules or are exempt from those rules. The new groups of people who will need to prove either their exemptions or their compliance includes older adults (up to age 64), parents with teenage children, veterans,

Even before making changes to eligibility systems, agencies can analyze existing case data to help identify who in their SNAP caseload will likely now have to meet SNAP work requirements. Agencies can proactively begin to size the affected population, and develop strategies to check if those clients have a reason that would exclude them from the work reporting requirements at their next recertification. According to federal regulations, agencies must screen existing participants for exemptions before applying SNAP's work rules. States should develop thorough processes for screening at application and recertification, making the most out of their forms and interviews.

For clients who newly have to meet work requirements, it will be difficult to make sense of this complex policy. States should focus on communicating the change in expectations and prepare both staff and notices to explain in plain language what these clients will now be required to report, and their options if they meet the time limit on SNAP benefits. Notices should prominently emphasize when participants will be screened, what might qualify them for exemptions, and what actions they need to take to keep their benefits.

SNAP's work-related time limit will newly apply to people who are:

- Adults aged 55-64, who don't live in a household with any children under 14

- Parents who are between 18 and 64 years old whose children are older than 13

- Veterans

- Former foster care youth under the age of 24

> **SNAP work requirements will newly exempt people who are "Indian," "Urban Indian," and "California Indian" as defined in the Indian Health Care Improvement Act.**

2. Make it easy for clients to identify exemptions, prove compliance, and share "good cause" if they are out of compliance due to circumstances outside of their control

SNAP clients subject to work requirements will need to report that they are doing "qualifying activities" for at least 80 hours a month every time they renew their benefits. For many living at the edge of poverty, "work" often looks like a patchwork of fluctuating gigs and side-hustles, and it isn't easy to piece together how each day adds up. States can help by making it easy for clients to report their qualifying activities when they apply and recertify and to share any necessary documentation in the agency's digital portal.

When life inevitably happens—a car breaks down or a family member gets sick and needs care—clients should be able to easily report to the agency that they have "good cause" for not being able to meet the 80 hour a month minimum. For this reporting mechanism to be effective, clients also need to understand what life events may qualify them for "good cause." It's important that self-serve digital reporting tools are not only available but also easy and accessible to use, and that the agency's communications and reporting tools clearly explain the good cause rules in language that's easy to understand.

[Data sources](#) are enormously helpful for quickly determining if many exemptions apply to a person, but they don't tell the whole story. Many people have a disability or a mental health reason for not being able to work 20 hours a week, but aren't receiving government disability benefits that would be captured in a database . Likewise, people who are unhoused and lack regular access to bathing or laundry facilities may not be immediately employable.

These circumstances can qualify someone for an exemption from the program's work rules. People who qualify for these exemptions can still work, but they won't lose access to food assistance if their disability limits their hours or ability to find and keep a job. Caseworkers will have to surface this kind of sensitive information during the SNAP interview, in a moment where many clients might not want to divulge such sensitive information. State agencies can begin revisiting the guidance, training, and support they offer to caseworkers so that staff are prepared to accurately capture situations that might not be readily visible from a client's application or data sources.

The time is now

Looking ahead to all that agencies will have to manage in the coming year, it can feel prudent to simply get to compliance first. But the impact of expanded work requirements on families in need and staff on the frontlines supporting them is too great to view human-centered approaches as a nice-to-have. There are critical steps that can be taken now, and getting clear about where to [prioritize limited focus](#) is essential. If states take the right preparations now, they can make sure clients and caseworkers have the best possible experience with these changes.

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