

Five reasons states should be planning for Medicaid and SNAP work requirements together

August 2025

The recently enacted [Public Law 115-334](#), (previously H.R. 1, the “One Big Beautiful Bill Act” or OBBBA) includes a major expansion of Supplemental Nutrition Assistance Program (SNAP) work requirements to older workers and parents (effective immediately, although federal guidance on the new provisions has not yet been released), as well as a new requirement for all states to implement work requirements as a condition of eligibility for many Medicaid recipients starting in January 2027. Based on [previous experience](#) with work requirements in public benefit programs, these requirements will cause millions of people to lose food assistance and health care coverage, including many who are [working](#) or who should qualify for exemptions, but who get caught up in the [administrative burden](#) of reporting requirements.

While all work reporting requirements create administrative burden and serve as a barrier to program access, state choices in setting policy and implementing it can make the difference between whether programs continue to serve most of those eligible for benefits or become available only in theory, inaccessible to those who need them most.

There will be dozens of detailed decisions that states need to make. But one high level choice will have sweeping consequences. **For the following reasons, state should start planning for both Medicaid and SNAP work requirements at the same time, in a coordinated manner:**

1 **There is a large overlap in the eligible populations.** The Urban Institute just estimated that about [12 million](#) households are in both programs. Others are eligible for both programs, even if they are only enrolled in one of them. And the programs support each other’s goals: food security is an important contributor to good health, and the cost of paying for health care can cause people to squeeze their food budgets.

For a long time, the outreach and enrollment services for these programs have been operated separately, often driven by federal funding restrictions. State, local and privately funders should leverage their investments by seeking opportunities to enroll people in [multiple programs](#).

2 **Integrated systems will save money, reduce errors, and prevent loss of benefits.** Both SNAP and Medicaid will need systems for determining exemptions and tracking participation in work activities. Building and operating separate systems will be costly and wasteful. And people will lose benefits because they know they already submitted the required documentation – and don’t realize that they only submitted it to



one program, and not the other. This already happens with respect to renewals. But the rules under the different programs are different enough that states will need to work through both federal rules and their own policies in order to align requirements.

3 Smart use of existing data will be crucial to preventing loss of benefits due to administrative burden. The new law includes language requiring states to use existing data to determine exemptions and participation as much as possible, including Medicaid encounter data. This creates a new opportunity to determine exemptions without requiring more paperwork from either participants or health care providers. If Medicaid knows that someone has cancer or has had a heart attack, they should not need to send in a form to be exempted. But there are a lot of issues that will need to be resolved, including privacy protections and how this data can be used for SNAP as well as Medicaid.

4 SNAP Employment and Training provides funding that can be used to support work activities. There is no dedicated funding for states to engage Medicaid recipients in work activities. But there is an existing mechanism for serving SNAP recipients – the [SNAP Employment and Training program](#). This program provides a 50% match for state or third-party spending on eligible work-related services, including supports such as transportation and child care. But it is only available for people receiving SNAP – and they must continue to receive SNAP in each month that the spending is claimed. Moreover, SNAP agencies must assess potential participants to ensure that the component is a good match for their needs and interests.

5 Planning for Medicaid and SNAP work requirements together, starting as soon as possible, creates the opportunity to address problems before Medicaid work requirements take effect. One of the biggest challenges in Medicaid will be the rule that people seeking coverage for the first time must meet the participation requirements *before* they can be enrolled. However, people subject to SNAP work requirements are exempted from the Medicaid requirements. Proactive enrollment efforts, starting as soon as possible, that include both SNAP and Medicaid, create the opportunity to screen for exemptions, educate participants about the requirements, and engage people in activities when needed – before an urgent need for medical care arises.

States can also use their own internal data, client feedback, and input from providers and community-based organizations to identify and address issues and create continuous improvement cycles. By examining what is and is not working in SNAP over the next year and a half, before the Medicaid requirements take effect, states can fix problems and reduce the number of people who are disenrolled.

Elizabeth Lower-Basch
elizabeth@graycatpolicy.com

