

Comparing Medicaid and Supplemental Nutrition Assistance Program Work Reporting Requirements Exemptions

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Section 71119 of [H.R.1](#) requires states to implement Medicaid work reporting requirements as a part of their Medicaid expansion or expansion-like programs beginning January 1, 2027. The statute provides for certain mandatory exemptions from Medicaid work reporting requirements, including for some people enrolled in the Supplemental Nutrition Assistance Program (SNAP).¹ H.R.1 also made changes to SNAP work reporting requirements.²

As states implement H.R.1's Medicaid work reporting requirements, states may be considering how to leverage data already available in their systems through SNAP to appropriately identify people who should be exempt from these new requirements in Medicaid, including certain individuals whose households receive SNAP as well as individuals who may fall into other Medicaid exemptions. Importantly, SNAP has its own work registration and reporting requirements as well as exemptions to those requirements, though SNAP's and Medicaid's exemptions do not fully align. Thus, states may be able to use some information on who is exempt from SNAP work requirements to determine exemptions for Medicaid.

To support this work, this tool outlines areas where exemptions from Medicaid's new work reporting requirements may overlap or relate to exemptions in SNAP to help states identify people who should not be subject to work reporting requirements in Medicaid.³ Specifically, this tool lays out mandatory and optional exemptions from Medicaid work reporting requirements in H.R.1, identifies whether SNAP has a corresponding exemption, and describes whether information in the state's public benefit system can be leveraged to exempt individuals from Medicaid's new requirements.

¹ Section 71119 of H.R.1 provides a mandatory exemption for an individual who "is a member of a household that receives supplemental nutrition assistance program benefits under the [Food and Nutrition Act of 2008](#) and is not exempt from a work requirement under such Act." See new section [1902\(xx\)\(9\)\(A\)\(ii\)\(VI\)\(bb\)](#) of the Social Security Act. While the Centers for Medicare & Medicaid Services (CMS) has not yet weighed in on this definition, this text appears to exempt an individual who meets both conditions: (1) whose household receives SNAP and; (2) is subject to SNAP work reporting requirements, regardless of whether or not the individual has *complied with* such work reporting requirements. This is in contrast to, for example, H.R.1's mandatory exemption for individuals "*in compliance with* any [work] requirements imposed by the State" related to the Temporary Assistance for Needy Families (TANF) program (emphasis added). CMS may provide further clarity in forthcoming guidance or regulation. See section [1902\(xx\)\(9\)\(A\)\(ii\)\(VI\)\(aa\)](#).

² Eligibility changes include, for example, expanding reporting requirements to older adults and parents of older children and removing exemptions for certain groups like veterans and former foster youth. For more information on changes to SNAP implemented through H.R.1, please see the U.S. Food and Nutrition Service summary [here](#).

³ The terms used in this document are those from the statutory language of H.R.1 and the SNAP program.

Medicaid Exemption	H.R.1 Medicaid Definition	SNAP Exemption ⁴	Aligned? ⁵	Information Likely Known to Medicaid	Can Eligibility System/Worker Leverage SNAP Exemption Information to Exempt Individual from Medicaid Work Reporting Requirements?
Mandatory Exemptions					
American Indian or Alaska Native	“who (aa) is an Indian or an Urban Indian (as such terms defined in paragraphs (13) and section (28) of section 4 of the Indian Health Care Improvement Act ; (bb) is a California Indian described in section 809(a) of such Act; or (cc) has otherwise been determined eligible as an Indian for the Indian Health Service under regulations promulgated by the Secretary”	<i>ABAWD</i> : “an Indian or an Urban Indian (as such terms are defined in paragraphs 13 and 28 of section 1603 of title 25); or [] a California Indian described in section 1679(a) of title 25”	Yes	Yes	Yes
Medically frail – have disabling mental disorder	“an individual . . . with a disabling mental disorder”	<i>General work requirement</i> : “[Not] mentally or physically fit”	Yes . While a state may have additional parameters for its Medicaid	No	Yes
Medically frail – have a significant physical,	“an individual . . . with a physical, intellectual, or developmental disability that				

⁴ To receive SNAP, most adults must satisfy certain work registration requirements (called “general work requirement” above in the table) unless they qualify for an exemption. In addition, certain adults must satisfy additional work reporting requirements to prevent time limits from applying to SNAP benefits. These latter work requirements have historically been described as applying to Able-Bodied Adults Without Dependents (ABAWDs). ABAWD work requirements, and their exemptions, were amended in H.R.1. The above table describes exemptions from SNAP’s general work requirement and ABAWD work requirement.

⁵ Alignment means the SNAP exemption may be utilized by the Medicaid agency as an exemption to Medicaid work requirements. Note that in circumstances where the state Medicaid agency already has the relevant data (such as instances where the individual is the parent of a child 13 and under), we have indicated “N/A” for the last column to note that the state does not need to use SNAP data for this purpose.

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intellectual, or developmental disability	significantly impairs their ability to perform 1 or more activities of daily living”	ABAWD: “medically certified as physically or mentally unfit for employment”	medical frailty definitions, at a minimum, it could leverage this SNAP information to meet one of these criteria		
Medically frail – have a serious or complex medical condition	“an individual . . . with a serious or complex medical condition”				
Medically frail – have substance-use disorder	“an individual . . . with a substance use disorder”	<i>General work requirement: “a regular participant in a drug addiction or alcoholic treatment and rehabilitation program”⁶</i> ABAWD: “medically certified as physically or mentally unfit for employment”	Yes	No	Yes
Participating in a drug addiction or alcoholic treatment program	“who is participating in a drug addiction or alcoholic treatment and rehabilitation	<i>General work requirement: “a regular participant in</i>	Yes	No	Yes

⁶ The SNAP statute defines a “Drug addiction or alcoholic treatment and rehabilitation program” as “any such program conducted by a private nonprofit organization or institution, or a publicly operated community mental health center, under part B of title XIX of the Public Health Service Act (42 U.S.C. 300x et seq.) to provide treatment that can lead to the rehabilitation of drug addicts or alcoholics.” See 7 U.S.C. 2012(h).

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	program (as defined in section 3(h) of the Food and Nutrition Act of 2008)”	a drug addiction or alcoholic treatment and rehabilitation program”			
Meeting TANF work reporting requirements	“is in compliance with any requirements imposed by the State pursuant to section 407”	<i>General work requirement:</i> “subject to and complying with a work registration requirement under title IV of the Social Security Act”	Yes	No	Yes
Parent, guardian, caretaker relative, or family caregiver of a disabled individual	“who is the parent, guardian, caretaker relative, or family caregiver (as defined in section 2 of the Recognize, Assist, Include, Support, and Engage (RAISE) Family Caregivers Act) . . . a disabled individual”	<i>General work requirement:</i> “parent or other member of a household with responsibility for the care of a dependent child under age six or of an incapacitated person”	Yes	Potentially	Yes
Parent, guardian, caretaker relative, or family caregiver of a dependent child age 13 and under	“who is the parent, guardian, caretaker relative, or family caregiver (as defined in section 2 of the RAISE Family Caregivers Act) of a dependent child age 13 years	<i>General work requirement:</i> “parent or other member of a household with responsibility for the care of a dependent child under age six”	Yes	Yes	N/A

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	of age and under or a disabled individual”	<i>ABAWD</i> : “parent or other member of a household with responsibility for a dependent child under 14 years of age”			
Veteran with disability rated as total	“who is a veteran with a disability rated as total under section 1155 of title 38, United States Code ”	No	No	No	N/A
Inmate	“who is an inmate of a public institution”	No	No	Yes	N/A
Recently released from incarceration within the past 90 days	“at any point during the 3-month period ending on the first day of such month, the individual was an inmate of a public institution”	No	No	Yes	N/A
Children under 19 [Medicaid eligibility group]	“Individual under the age of 19” “described in any of subclauses (I) through (VII) of subsection (a)(10)(A)(i)”	<i>General work requirement</i> : Applies to: individuals “over the age of 15”; “a person between the ages of sixteen and eighteen who is not a head of a household or who is attending	N/A (Medicaid eligibility group)	Yes	N/A

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		school, or enrolled in an employment training program, on at least a half-time basis” <i>ABAWD: “under 18”</i>			
Parents and other caretaker relatives [Medicaid eligibility group]	“described in any of subclauses (I) through (VII) of subsection (a)(10)(A)(i)”	<i>General work requirement: “parent or other member of a household with responsibility for the care of a dependent child under age six or of an incapacitated person”</i> <i>ABAWD: “parent or other member of a household with responsibility for a dependent child under 14 years of age”</i>	N/A (Medicaid eligibility group)	Yes	N/A
Pregnant [Medicaid eligibility group]	“described in any of subclauses (I) through (VII) of subsection (a)(10)(A)(i)”	<i>ABAWD: “a pregnant woman”</i>	N/A (Medicaid eligibility group)	Yes	N/A

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	“who is pregnant or entitled to postpartum medical assistance under paragraph (5) or (16) of subsection (e)”				
Postpartum [Medicaid Eligibility Group]	“who is pregnant or entitled to postpartum medical assistance under paragraph (5) or (16) of subsection (e)”	N/A	N/A (Medicaid eligibility group)	Yes	N/A
Medically frail – blind or disabled [Medicaid eligibility group]⁷	“who is blind or disabled (as defined in section 1614)” ⁸	N/A	N/A (Medicaid eligibility group)	Yes	N/A
Receiving Supplemental Security Income (SSI) [Medicaid eligibility group]	“described in any of subclauses (I) through (VII) of subsection (a)(10)(A)(i)”	N/A	N/A (Medicaid eligibility group)	Yes	N/A
Foster youth [Medicaid eligibility group]	“described in any of subclauses (I) through (VII) of subsection (a)(10)(A)(i)”	N/A	N/A (Medicaid eligibility group)	Yes	N/A
Former foster youth under age 26 [Medicaid eligibility group]	“who is described in subsection (a)(10)(A)(i)(IX)”	N/A	N/A (Medicaid eligibility group)	Yes	N/A

⁷ While CMS has not yet issued guidance or regulations further defining this exemption, it is possible CMS will limit this exemption to the Medicaid eligibility group given H.R.1’s reference to [section 1614](#) of the SSA.

⁸ Definition of “blind” under [section 1614](#) is an individual with central visual acuity of 20/200 or less in the better eye with use of a correcting lens. An eye which is accompanied by a limitation in the fields of vision such that the widest diameter of the visual field subtends an angle no greater than 20 degrees shall be considered for purposes of the first sentence of this subsection as having a central visual acuity of 20/200 or less. An individual shall also be considered to be blind for purposes of this title if he is blind as defined under a State plan approved under title X [Aid for the Blind] or XVI [SSI] as in effect for October 1972 and received aid under such plan (on the basis of blindness) for December 1973, so long as he is continuously blind as so defined. An individual is considered to be “disabled” under section 1614 “if he is unable to engage in any substantial gainful activity by reason of any medically determinable physical or mental impairment which can be expected to result in death or which has lasted or can be expected to last for a continuous period of not less than twelve months.”

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Entitled to Medicare Part A or Part B	“Entitled to, or enrolled for, benefits under part A of title XVIII or enrolled for benefits under Part B of title XVIII”	N/A	No	Yes	N/A
Additional Exemptions from Work Reporting Requirements in SNAP					
N/A⁹	N/A	<i>General work requirement: “subject to and complying with a work registration requirement under title IV of the Social Security Act, as amended (42 U.S.C. 602), or the Federal-State unemployment compensation system”</i>	No	N/A	No
N/A¹⁰	N/A	<i>General work requirement: “a bona fide student enrolled at least half time in any recognized school, training</i>	No	No	No¹¹

⁹ If an individual’s monthly unemployment benefit is \$580 or above, SNAP exemption data may be used to demonstrate compliance with Medicaid work requirement.

¹⁰ While not an exemption, studying in school or a training program at least-half time is a compliance activity for Medicaid work reporting requirements. To demonstrate compliance with Medicaid work reporting requirements, an individual must be “enrolled in an educational program at least half-time.”

¹¹ It is possible this data may be leveraged in SNAP to determine an individual’s compliance with Medicaid work reporting requirements.

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		program, or institution of higher education” (college students are subject to other eligibility rules)			
N/A	N/A	Good cause exceptions for refusing or failing to comply with work requirements in a given month, including circumstances beyond the individual’s control ¹²	No	No	No
Optional Short-Term Hardship Exemptions from Medicaid Work Reporting Requirements					
Living in a county impacted by a federally declared emergency or disaster	“such individual resides in a county (or equivalent unit of local government) (aa) in which there exists an emergency or disaster declared by the President pursuant to the National Emergencies Act or the Robert T. Stafford Disaster	N/A	No	Yes	N/A

¹² See 7 CFR 273.7(i).

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	Relief and Emergency Assistance Act				
Living in county with high unemployment rate	“such individual resides in a county (or equivalent unit of local government) . . . (bb) that, subject to a request from the State to the Secretary, made in such form, at such time, and containing such information as the Secretary may require, has an unemployment rate that is at or above the lesser of (AA) 8 percent; or (BB) 1.5 times the national unemployment rate”	<i>ABAWD</i> : Secretary makes determination that the area in which the individual resides “(i) has an unemployment rate of over 10 percent; or (ii) is in a noncontiguous State which has an unemployment rate that is at or above 1.5 times the national unemployment rate”	Potentially , depending on the applicable rate of unemployment for Medicaid	Yes	Potentially
Receiving inpatient hospital care; Receiving nursing facility services; Receiving services in an intermediate care facility for individuals with intellectual disabilities; Receiving other services of similar acuity.	“such individual receives inpatient hospital services, nursing facility services, services in an intermediate care facility for individuals with intellectual disabilities, inpatient psychiatric hospital services, or such other services of similar acuity (including outpatient care relating to other services	No	No	No	N/A

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	specified in this subclause) as the Secretary determines appropriate”				
Traveling for an extended period to access medically necessary care for a serious or complex medical condition that is not available in the individual’s community for either themselves or their dependent(s)	“such individual or their dependent must travel outside of their community for an extended period of time to receive medical services necessary to treat serious or complex medical condition (as described in (9)(A)(ii)(V)(ee)), that are not available within their community of residence”	No	No	No	N/A



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