



Supporting Youth Aging Out of Foster Care through SNAP

Introduction

Food insecurity is not a problem unique to youth who have aged out of foster care, but it is a problem that they experience at disproportionate rates. More than 30 million people lived in food insecure households in 2021, meaning that they were unable to consistently access enough, nutritious food.¹ Within that group, 8.6 million adults lived in households with very low food security, a classification that was previously labeled as “hunger,” and is characterized by less-than-adequate food consumption and disrupted meal patterns. Poverty is a root cause of food insecurity, leaving households without the resources to buy enough nutritious food. Because youth aging out of foster care are particularly at risk of experiencing poverty due to systemic failings within child protective services

as well as our broader system of economic supports, they are also disproportionately impacted by food insecurity: according to recent surveys, at least a quarter of youth who experience foster care are food insecure.²

With food insecurity comes a host of other risks to former foster youths’ health and well-being. Poor nutrition and food insecurity—compounded by lack of health care, limited social connections, and insufficient housing—can contribute to a number of diet-related illnesses like obesity, diabetes, and high blood pressure, each of which can exacerbate an existing health condition, like asthma.³ Food insecurity is also detrimental to mental health, as not knowing where a person’s next meal will come from can cause or contribute to elevated

YOUTH AGING OUT OF FOSTER CARE

In Fiscal Year (FY) 2021, 17,759 young adults aged out of the foster care system without having achieved legal permanency with a family to provide them with support and stability.⁴ In 2021, 9 percent of children entering foster care for the first time were placed in congregate care, where they were even less likely to form permanent relationships with adults who could support them as they transitioned to adulthood.⁵

Among all children in foster care at the end of FY 2021, 51 percent were male and 49 percent were female. Forty-three percent were white (compared with 49 percent of all U.S. children), 22 percent were Black or African American (compared with 14 percent of all U.S. children), 22 percent were Latinx/e (compared with 26 percent of all U.S. children), two percent were American Indian/Alaskan Native (compared with one percent of all U.S. children) and one percent were Asian (compared with five percent of all U.S. children), with the remainder unknown or of two or more races.^{6,7} Looking beyond national data reveals significant variation in racial disparities depending on the jurisdiction. For example, in D.C., 83 percent of children in foster care are Black (compared to 52 percent of all children) while zero percent of children are white, though white children comprise 24 percent of all children.⁸ Data regarding sexual orientation, gender identity, and gender expression reveal still other disparities in child welfare involvement. According to one study, 15.5 percent of young people over age 11 who have been involved in the child welfare system identified as LGB, compared to 8 percent of all youth over age 11; due to various data limitations, this is likely an underestimate.⁹

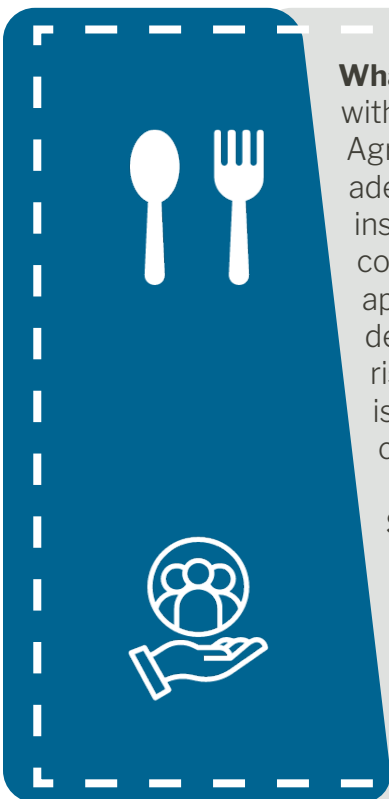
stress levels, anxiety, and depression.¹⁰ Because the state has taken young people in foster care from their families and often their communities, the state has a special responsibility to ensure that young people have adequate and nutritious food, in addition to other economic supports, when they age out of foster care.

Youth “age-out” of foster care between ages 18 to 21, depending on the state.¹¹ This means that they leave foster care on their own, without being connected or reconnected to family. Although the child welfare system is primarily responsible for a youth’s well-being while they are in foster care, the system does not sufficiently prepare former foster youth for the challenges that come with living independently. Most youth in the U.S. are not able to fully support themselves financially by age 18 or 21, and this is even more true for youth who have experienced foster care, where the state has weakened and in some cases severed their connections to family members or friends who might have supported them in the transition to adulthood. Because the foster care system often does not adequately support young people while in foster care, or as they transition out, youth who aged out are more likely to experience unemployment, to become unhoused, and to struggle to afford food. We owe young people who have experienced foster care

much more. Public policy should ensure young people can gain stability and meet their needs upon leaving the foster care system. The Supplemental Nutrition Assistance Program, or SNAP (formerly known as the Food Stamp Program) can help.

SNAP benefits, which lifted 3.7 million people out of poverty in 2022, act as a buffer against the economic and health impacts of food insecurity, allowing youth who have experienced foster care to afford groceries so they can prepare nutritious meals and grow into healthy adults able to pursue their goals.¹² Good health is a precursor to economic stability and well-being, as it directly impacts a young person’s ability to find and retain employment, to care for loved ones, or pursue an education. When youth who are parents or caregivers receive SNAP, their children also benefit, as a child’s well-being depends on that of their family members.

The Fiscal Responsibility Act of 2023 (FRA) includes new provisions which should eliminate some of the barriers former foster youth have experienced in accessing SNAP.¹³ This brief explains the new rules and the steps that state agencies can take to ensure that former foster youth are able to access the critical nutrition assistance they are now owed.



What is food insecurity? Food insecurity is related to, but not synonymous with hunger. The concept of “food security” is used by the U.S. Department of Agriculture to measure a household’s social and economic ability to access adequate food for an active, healthy life. The most common cause of food insecurity is poverty, but in a broader sense other factors—including housing costs, medical costs, and lack of access to food retailers or culturally appropriate foods—can also impact food security. Food insecurity of any degree indicates a lack of resources needed to meet basic needs and a risk of poorer health outcomes due to lower quality nutrition. Poor nutrition is detrimental to individuals of all ages, but it is especially damaging to children and young adults who are still growing and developing.

SNAP is a strong support for former foster youth. SNAP is administered by the U.S. Department of Agriculture’s Food and Nutrition Service and is the largest federal nutrition program. It provides monthly nutrition benefits to eligible families and individuals with low incomes that can be used to purchase food at authorized retailers. With limited exceptions, SNAP benefits can only be used to purchase groceries, including bread, cereal, fruits and vegetables, meat, and dairy products.¹⁴

Former Foster Youth Experience Significant Economic Hardship— And Too Few Receive SNAP

Youth who have experienced foster care face significant economic instability because of their interactions with the child protective services system. Because the state removed them from their families—and in some cases communities—they often do not have access to the same level of support and guidance from family that many other young people receive as they make their way into adulthood. In interviews CSSP conducted with youth who had transitioned out of care, they consistently reported feeling ill-prepared for living independently. As Diane, who lived in New York City, recalled, “I had to figure literally everything out on my own. I feel like some of the case managers at the agencies could have taught us a little bit more for aging out. Like money management, how to build your credit, and everything. It’s like you’re thrown out to the wolves.”¹⁵

Society’s failure to adequately support young people and their families and the harmful impact of the child protective services system is evident in the experiences of young people exiting foster care, who

are exposed to hardships such as homelessness at high rates. According to a national survey of youth transitioning out of care, over one in five (21 percent) of 19-year-olds who responded indicated that they had experienced homelessness at some point during the two previous years, 79 percent of whom had left foster care. Over a quarter (26 percent) of 21-year-olds had experienced homelessness within the past two years, of whom 90 percent were former foster youth.¹⁶ This data highlights how poorly child protective services and other public systems support foster youth as they transition to adulthood.

Educational opportunities are a key factor in assuring economic stability for youth who have experienced foster care and all young people, but postsecondary students experience food insecurity and economic hardship at high rates, and youth who have experienced foster care are even more likely to struggle to meet their basic needs. According to a 2020 survey of over 195,000 students by the Hope Center for College, Community, and Justice, overall 61 percent



College Students Face Additional Barriers to Accessing SNAP.

Under federal rules, it is difficult to qualify for SNAP benefits as a college student. College students attending classes at least halftime must also work an average of 20 hours per week to be eligible. Some students who work less than 20 hours per week may be eligible, but must prove they meet certain conditions. Students who may be eligible include those who meet one of the following requirements:¹⁷

- Receive federal work study
- Are caring for a child younger than age 12
- Have a disability
- Are enrolled in a government sponsored education and training program, including SNAP Employment and Training programs and programs authorized by the Workforce Innovation and Opportunity Act.¹⁸

Simply determining whether a college student meets the qualifications for SNAP is complicated. For students who are also former foster youth and lack a strong support system, navigating the SNAP application process and providing all the necessary documentation is a daunting and sometimes impossible task. The Enhanced Access to SNAP Act of 2023 would eliminate these additional eligibility restrictions for students, putting them on equal footing with other SNAP applicants.¹⁹

of students at two-year institutions and 53 percent of students at four-year institutions experienced food insecurity, housing insecurity, homelessness, or some combination of the three in the past year—what they describe collectively as “basic needs insecurity.”²⁰ Students who had been in the foster care system at some point had significantly higher rates of basic needs insecurity: overall 78 percent of students with experience of foster care experienced basic needs insecurity, compared to 57 percent of students without experience in foster care.²¹ A growing number of institutions offer food pantries and other forms of food assistance to students during the semester, but these supports may be inaccessible in the months between academic terms, and they do not meet the need.²²

All of these factors suggest that youth who have transitioned out of foster care can especially benefit from government assistance to help them meet their basic needs and pursue their goals. But youth transitioning to adulthood can easily fall into a gap—supports for youth have traditionally ended at age 18, but many federal services and benefits for adults were designed for older individuals or parents, based on the assumption that young people are still supported by their families, which is simply not the case for large numbers of young people. Many families cannot provide the necessary level of support to young adults, and youth who age out of care often do so without connection to adults who are able to provide that support. The result is that youth are left without the support they need during a critical period of development. For example, the Earned Income Tax Credit (EITC) lifted 5.6 million people out of poverty in 2018 by boosting the income of low-wage workers,²³ yet a youth leaving foster care will not be eligible for the EITC until the age of 25, unless he or she has a dependent child.²⁴ The Affordable Care Act guarantees access to Medicaid up to age 26 for former foster youth, but for years former foster youth who moved out of the state in which they had been in foster care were at risk of losing their coverage. While this loophole was closed for youth who age out of care after January 1, 2023, it remains for those who had *already* aged out and moved out of state before that date. For these young people,

losing their health coverage increases the potential for continued health disparities and increased economic vulnerability.

Administrative barriers and other punitive requirements have also limited access to food assistance and other economic supports for former foster youth. Overall, despite high rates of poverty and unemployment, former foster youth participate in public assistance programs at relatively low rates—data from the National Youth in Transition Database (NYTD) indicate that 30 percent of youth participate in some form of public assistance at age 19.²⁵ Participation in SNAP is even lower. According to NYTD, 24 percent of youth aged 21 who have left the foster care system receive public food assistance, including SNAP.²⁶ Research in states suggests that many young people who are eligible for SNAP do not access it. A survey of young people in California’s Transitional Housing Placement-Plus program, which serves former foster youth and out-of-home probation youth, found that just 23 percent of youth were receiving SNAP at program exit, despite at least 50 percent of non-parents and at least 67 percent of parents being eligible.²⁷

Given that many young people who are eligible for SNAP are not receiving it, it is not surprising that they experience food insecurity at high rates. According to a 2020 survey by Think of Us, with approximately 24,000 respondents ages 14 to 27, difficulty affording adequate, nutritious food is commonplace. Among young people ages 22 to 27, 28 percent were highly food insecure, responding that “It is a struggle to eat every day” or “Every week there is at least one day that I need food.”²⁸ A smaller survey tracking the impact of the pandemic on 281 youth who had been in foster care found that 25 percent of those who had aged out reported either “I cannot access food—I am in crisis” or “my access to food is very low.”²⁹

One reason that many young people have likely not received SNAP in the past is the work requirement and time limit for so-called Able-Bodied Adults Without Dependents, or ABAWDs.

SNAP's Work Reporting Requirement and Time Limit

SNAP generally operates as an entitlement program—all applicants who meet the program's eligibility requirements can receive the full amount of benefits for which they qualify. However, for one subset of participants—misleadingly called Able-Bodied Adults Without Dependents, or ABAWDs—SNAP benefits are time-limited.

The SNAP ABAWD provision was established by the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA)—the same law that placed work reporting requirements and other restrictions on cash assistance for families with children. The law was a culmination of decades of policy debates in which racist and sexist myths were invoked to limit government assistance to people deemed “deserving.”³⁰ The ABAWD provision reflects this legacy. In practice, it applies to many who are not “able bodied”—a term now out of favor in the disability community—as well as many who have children and may have significant caregiving responsibilities. Those who fall into the ABAWD category are subject to a work reporting requirement and time limit:

- They must be employed or actively participating in a work program for at least 80 hours per month. Job search activities cannot meet the full 80-hour requirement.
- Those who do not meet this work reporting requirement are limited to three months of SNAP benefits in a 36-month period.

The SNAP Work Reporting Requirement Under the Fiscal Responsibility Act of 2023

The FRA changes who is subject to the SNAP work requirement and time limit in two significant ways. First, it expands the work reporting requirement for older adults. While previously, it applied to adults ages 18-49 who did not have children living with them, the law gradually phases it in for people ages 50-54. Second, it creates new exemptions to the working requirement for homeless individuals, veterans, and former foster youth who are 24 years old or younger and were in foster care on their 18th birthday. Both the expansions to the work reporting requirement and the new exemptions expire on October 1, 2030.

The U.S. Department of Agriculture Food and Nutrition Service (FNS) has instructed states to make it as straightforward as possible to access SNAP for former

The ABAWD work requirement and time limit fall on top of general work requirements that apply to SNAP participants—such as that they not voluntarily quit a job without good cause and take a suitable job if offered.³¹ Research has clearly shown that the ABAWD work requirement, like work reporting requirements in other government programs, does not increase employment, but instead leads many people to lose assistance they need to put food on the table—in part because of the significant administrative burdens that work reporting requirements impose on both participants and agencies administering programs.³² In the last several congresses lawmakers have introduced legislation to eliminate the ABAWD work requirement, but the bills have not come up for a vote.³³

Previously, many former foster youth were considered ABAWDs, and therefore subject to SNAP's punitive work requirement and time limit. But the Fiscal Responsibility Act of 2023 (FRA) creates new exemptions from the SNAP work requirement and time limit—including for former foster youth.

foster youth and others who are newly exempted from the work requirement and time limit. In guidance to states, FNS has clarified that the former foster youth exemption applies to “any individual who was in a foster care program run by the State, District, Territory, or Indian Tribal Organization as of their 18th birthday or later and who is under 25 years of age.”³⁴ Notably, states are required to screen *everyone* applying for SNAP to see if they are exempted.³⁵ This includes both people submitting their initial application, as well as those submitting a recertification application. There are no new verification requirements for these exemptions, so state agencies should *not*, as a matter of routine practice, require former foster youth to prove their status by presenting documentation or other paperwork.³⁶

States Should Act to Promote Access to SNAP for Former Foster Youth

The FRA has lifted a significant barrier to accessing SNAP for youth who have experienced foster care and others who are newly exempted from the ABAWD work requirement and time limit. In order to ensure former foster youth receive the support they need and are now owed, states must act.

States should work expeditiously both to implement administrative processes to comply with FNS requirements and ensure all SNAP applicants are properly screened for exemptions, and conduct proactive outreach to former foster youth and others

Carefully Administer Exemptions

Research on the effects of work reporting requirements has shown that the administrative burden they create for agencies and program participants often leads people to lose assistance even if they are meeting the work requirement, or should be exempted in the first place.³⁸

Given the complexity of the ABAWD work requirement and the new exemptions, it is critical that state and local agencies ensure all staff are properly trained on the new rules, and that every applicant is screened to see if they meet exemptions—both the new exemptions, as well as longstanding exemptions for people who are pregnant, living with a child, experiencing

who may be newly eligible for SNAP. Ensuring newly former foster youth can access SNAP will require states to devote significant resources to implementing the new rules, at a time when many agencies are already under strain as they struggle with staffing shortages while implementing larger shifts to public benefit eligibility as pandemic-era policies wind down.³⁷ But it is absolutely critical that agencies carefully administer the new exemptions, and take proactive steps to increase take up of SNAP, so that former foster youth and others receive the food assistance they need.

physical or mental barriers to work, and more. Screening questions should be in plain language, and tested to ensure they identify individuals who meet the new exemptions. Because some young adults with experience in foster care may not self-identify due to stigma or bad experiences in foster care, states should explain why the question is being asked and that the information will be kept confidential.³⁹

Agencies must be careful not to require unnecessary documentation of applicants. Research has shown that former foster youth often do not have basic documents that are routinely required to access

THOUGHTFULLY-DESIGNED SNAP EMPLOYMENT & TRAINING PROGRAMS CAN HELP PARTICIPANTS FIND STABLE EMPLOYMENT

While work reporting requirements and time limits on programs that meet basic needs do not help individuals find jobs that enable them to support their families, employment and training programs can. In recent years, the U.S. Department of Agriculture (USDA) has pushed for greater coordination and use of SNAP Employment & Training (SNAP E&T) funds to help connect SNAP recipients to long-term, stable jobs that would allow them to transition off of SNAP benefits. Additional federal funds for SNAP E&T are available to states that pledge to offer a qualifying SNAP E&T component to all recipients who are classified as ABAWDs and nearing the end of their three-month period of eligibility.⁴⁰ In 2015 the USDA awarded pilot grants to 10 states to determine the most effective ways to help SNAP recipients gain and retain stable jobs with good wages.⁴¹

The SNAP E&T pilots revealed that connecting nutrition supports and employment supports can increase earnings and employment, but that such programs need to be carefully designed to meet the needs of participants and the conditions of the local job market to truly help participants achieve their goals. For example, as participants often face barriers to participation such as unreliable transportation, a lack of childcare, housing instability, and health problems, state programs need to provide a variety of intensive support services to address these challenges.⁴²

Additionally, evaluations indicate that sanctioning participants with loss of SNAP benefits for not engaging in E&T activities—often due to the described barriers—led to lower earnings and employment than those who had not been sanctioned.⁴³ As states consider how to move forward and carefully design their own SNAP E&T programs following these pilots, they should not forget that SNAP is first and foremost a program to combat food insecurity, not a work program.⁴⁴ Consequently, SNAP receipt should not be conditioned on participation in employment services; rather, the employment component should be regarded as a voluntary service available to SNAP participants so that those who do not participate do not lose critical nutrition support.

public services. For example, though child welfare agencies are required to provide youth aging out of care with a birth certificate, state-issued identification card and proof of residency, and other critical documents, many youth who age out of care still do not have access to these documents. According to one study of California former foster youth interviewed in 2019 and 2020, 14.2 percent did not have their Social Security card and 21.3 percent did not have their birth certificate.⁴⁵ People who are unhoused face similar hurdles to access documentation.

In guidance to states, FNS is clear that it expects states to accept

Improve Participation Through Transition Planning and Data Sharing

In addition to properly administering the new exemptions, it is important to raise awareness among former foster youth that they may be eligible for SNAP and support them in applying. Routinely screening youth for SNAP eligibility as part of the transition planning process⁴⁷ as they leave foster care is one simple solution that can increase participation in SNAP among youth exiting the foster care system.

For example, to address the low number of former foster youth in California who were applying for SNAP benefits (known as CalFresh), in 2013 the California Department of Social Services advised county social workers or probation officers to complete a CalFresh application with youth as a part of the standard process of meetings that case

statements from applicants that they meet one of the new exemptions, without requiring additional verification. States are only required to verify information if they have determined it is questionable. If states determine information is questionable, acceptable forms of verification of foster care status include, but are not limited to: “information from independent living coordinators who administer programs for supporting youth in and transitioning out of foster care, information from Medicaid or foster care programs, and statements from someone familiar with the individual’s circumstances.”⁴⁶

workers hold with youth when they transition out of the foster care system.⁴⁸ Other instructions include informing youth how to submit their completed application and introducing them, when possible, to the CalFresh eligibility worker who will process their application. Some counties have taken additional steps to ensure these young people’s applications are processed as rapidly as possible. In Los Angeles County, for example, child welfare workers are required to not only assist youth transitioning out of care with their CalFresh applications, but also to schedule an appointment with an eligibility worker and help youth follow up on the status of their application.⁴⁹

States can further simplify the SNAP application process for youth who are aging out of

LESSONS FROM MEDICAID OUTREACH

Simplified eligibility determination, enrollment, and renewal processes were implemented in the wake of the Affordable Care Act to improve access to health insurance under Medicaid for youth who have aged out of foster care. Lessons from state implementation of these processes for former foster youth can be applied to SNAP as well.

- Coordinate with child welfare agencies: The state of Maryland developed materials that inform foster youth about Medicaid coverage as well as Maryland’s tuition waiver. Information about SNAP can be similarly bundled with other information provided by child welfare agencies to youth aging out of care.
- Reduce burdens on foster youth and child welfare workers: In California, the Coveredtil26 project of Children Now coordinated with county offices to create enrollment forms that were easy to understand and pre-populated with information the counties already had, to avoid placing extra burdens on enrollees.
- Use data matches: Some states—including Arkansas, Illinois, Oregon and West Virginia—have implemented administrative transfers that allow state agencies to use enrollment information from other programs to enroll eligible individuals into Medicaid. A similar process can be used to more quickly certify and recertify youth who have aged out as eligible for SNAP benefits.
- Directly engage former foster youth in outreach: By engaging both youth who are currently in care and those who have aged out, states can effectively address the specific challenges facing youth aging out of care, in addition to building awareness in the community about supports available to former foster youth. For example, the Coveredtil26 project partnered with California Youth Connection, an organization led by youth who have experienced foster care, to inform its outreach campaign on expanded Medicaid. This campaign developed outreach materials, including videos, webinars, and flyers, to educate foster youth on their rights, explain how to enroll in Medicaid, and offer guidance around navigating roadblocks.

foster care through data sharing, requiring the agency administering child protective services to share data on youth aging out with the SNAP administering agency, so they have the information necessary to start SNAP applications and the SNAP agency knows from the start that they are eligible for exemptions from the ABAWD work requirement.

All of these additional steps that minimize the burden placed upon youth leaving the foster care system are important. Youth who have spent a significant portion

Increase Participation Through Community Outreach

In addition to helping young people aging out of foster care as part of the transition planning process, states should partner with community-based organizations to increase awareness of SNAP among young people who have already aged out of foster care and help them apply. Young people who have aged out of care may not be in contact with staff at government agencies, but they may well have close relationships with staff

of their lives dealing with state-imposed restrictions and bureaucracy—and may have experienced significant harm at the hands of the state—are not likely to be inclined to negotiate a new system of rules and bureaucracy at the moment that they gain independence. Case workers can ensure that the SNAP application system is as navigable as possible, allowing youth who have aged out of care to build a system of supports for themselves before their need becomes acute.

at community-based organizations who serve young people, such as those that offer life skills coaching, help youth navigate public supports, or offer drop-in social spaces. States should share information about the new SNAP rules in accessible ways to staff at community-based organizations, and undertake outreach campaigns to encourage young people who have already aged out to apply for SNAP.

Conclusion

Young people leaving the foster care system are not strangers to hardship and instability. As they exit foster care, leaving the custody of the state and becoming responsible for supporting themselves, they need and are owed support in meeting their most basic needs, including food security.

SNAP can provide a small, but crucial support to young people. As states work to ensure that young people can access the nutrition assistance they are owed, it is critical that federal policymakers further reduce

barriers to SNAP.⁵⁰ In particular, Congress should eliminate the ABAWD work reporting requirement and time limit in its entirety, along with the more general work requirements in SNAP. Food should be a basic human right, and everyone should be able to access the assistance they need to afford adequate and nutritious meals. Given the administrative burdens created by work requirements, even for those exempted, repealing the work requirement entirely is the only way to ensure that former foster youth and others who need assistance are able to access SNAP.

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²² See, for example McCoy Maureen et al. “Food Insecurity on College Campuses: The Invisible Epidemic.” Health Affairs, January 31, 2022. Available at: <https://www.healthaffairs.org/content/forefront/food-insecurity-college-campuses-invisible-epidemic>.

²³ Center on Budget and Policy Priorities. (Updated 2023). *Policy Basics: The Earned Income Tax Credit*. Retrieved from: <https://www.cbpp.org/research/federal-tax/the-earned-income-tax-credit#:~:text=Reducing%20Poverty&text=The%20credit%20reduced%20the%20severity,17.5%20million%20others%20in%202018>.

²⁴ The American Rescue Plan Act of 2021 temporarily lowered the minimum age for people without qualifying children to be eligible for the EITC to 19, and to 18 from homeless youth and youth transitioning out of foster care. These changes were in place for the 2021 tax year only.

²⁵ National Youth in Transition Database. (2017). *Comparing Outcomes Reported by Young People at Ages 17 and 19 in NYTD Cohort 2*. Retrieved from: https://www.acf.hhs.gov/sites/default/files/documents/cb/nytd_data_brief_6.pdf

²⁶ National Youth in Transition Database, (2021). *Outcomes Data Snapshot: National*. Retrieved from: <https://www.acf.hhs.gov/sites/default/files/documents/cb/nytd-outcomes-national-2021.pdf>.

²⁷ John Burton Advocates for Youth, *THP-NMD & THP-Plus Annual Report 2018-19: Providing Affordable Housing and Supportive Services to Youth Transitioning from California’s Foster Care and Juvenile Probation Systems* (October 2019). Retrieved from https://jbay.org/wp-content/uploads/2020/12/THP-NMD_THP-PLUS_Annual_Report_FINAL.pdf.

²⁸ Think of Us, *Think of Us COVID-19 Microcash Grant Application Data Briefing* (March 2021), retrieved from <https://www.thinkofus.org/case-studies/microcash-grant-covid-19-data>; External Link - Think of Us COVID-19 Data Briefing https://docs.google.com/document/d/10xrE100cowLjDiyCvwOoCEp4XI9_PSW/edit

²⁹ See Greeson, Johanna K.P. et al. (2022), *The Experiences of Older Youth in and Aged Out of Foster Care During the COVID-19 Pandemic: Material and Financial Well-Being by Foster Care Status, Gender Identity, Sexual Orientation, Ethnicity, and Race*. *American Journal of Orthopsychiatry*, 92 (3), 334–348 <https://doi.org/10.1037/ort0000615>.

³⁰ Minoff, Elisa. “The Racist Roots of Work Requirements.” Center for the Study of Social Policy, February 2020. Available at: <https://cssp.org/resource/racist-roots-of-work-requirements/>

³¹ For a summary of the work requirements in SNAP see USDA Food and Nutrition Service, “SNAP Work Requirements.” Available at: <https://www.fns.usda.gov/snap/work-requirements>. For an excellent overview and summary of the research on the impact of the work requirement and time limits on individuals and families, see Coan, Tori and Shawn Fremstad. “The Dismal Economics of SNAP’s Work-Hours Test and Time Limit.” Center for Economic and Policy Research, April 18, 2023. Available at: <https://cepr.net/report/the-dismal-economics-of-snaps-work-hours-test-and-time-limit/>.

³² Coan and Fremstad, “The Dismal Economics.” Hutchful, Esi. “Ending Barriers to Support: Five Arguments Against Work Requirements.” Center for the Study of Social Policy, May 2023. Available at: <https://cssp.org/resource/five-arguments-against-work-requirements/>. Minoff, Elisa. “What Do Work Requirements Actually Require? A Look at Programs That Meet Families’ Basic Needs in Montgomery County, Maryland.” Center for the Study of Social Policy, June 2019. Available at: <https://cssp.org/resource/what-do-work-requirements-actually-require/>.

³³ The Improving Access to Nutrition Act of 2023, H.R. 1510, S2435, sponsored by Rep. Barbara Lee and Sen. Peter Welch, would end the ABAWD work requirement and time limit for SNAP.

³⁴ For agency guidance on the law, see “Implementing SNAP Provision sin the Fiscal Responsibility Act of 2023.” June 30, 2023. Available at: <https://www.fns.usda.gov/snap/implementing-fra-provisions-2023>.

³⁵ See USDA FNS, “Supplemental Nutrition Assistance Program (SNAP) – SNAP Provisions of the Fiscal Responsibility Act of 2023 – Questions and Answers” July 27, 2023. Available at: <https://www.fns.usda.gov/snap/provisions-fiscal-responsibility-act-2023-questions-and-answers-1>.

³⁶ Ibid. FNS explains that States should only require verification if they determine that the information they have received is questionable. Examples of verification that they may accept include, but are not limited to “Data sharing and/or collateral contact from other social service workers or agencies, such as the agency administering the foster care program or Medicaid.”

³⁷ U.S. Department of Agriculture, Food and Nutrition Services. (2022). *Considerations for Improving Participant Experiences in the USDA Supplemental Nutrition Assistance Program Employment and Training (SNAP E&T) Programs: Lessons From the*

SNAP E&T Pilots (Summary). Retrieved from: <https://fns-prod.azureedge.us/sites/default/files/resource-files/SNAP-E-and-T-Lessons-Summary.pdf>

³⁸ Hayes, Teon and Elizabeth Lower-Basch, “Strategies to Improve the Effectiveness of SNAP’s Employment and Training Program.” The Center for Law and Social Policy, August 2023. Retrieved from: <https://www.clasp.org/wp-content/uploads/2023/08/SNAP-ET.pdf>

³⁹ For example, during the COVID-19 public health emergency, the ABAWD work requirement and time limit was suspended for all SNAP participants, under the Families First Coronavirus Response Act (FFCRA). SNAP administering agencies only recently reinstated the work requirement on July 1, 2023—just as they simultaneously began to make plans for implementing the new expansions and exemptions to the work requirement under the FRA.

⁴⁰ Hill, Ian, Emily Burroughs, and Gina Adams, “New Hampshire’s Experience with Medicaid Work Requirements: New Strategies, Similar Results.” Urban Institute. February 2020. Retrieved from: https://www.urban.org/sites/default/files/publication/101657/new_hampshires_experience_with_medicaid_work_requirements_v2_0_7.pdf

⁴¹ Screeners should be trained so that they are responsive to the needs and experiences of youth who have experienced foster care, and online features should explain why a question is being asked.

⁴² U.S. Department of Agriculture, Food and Nutrition Service. (2015). Guide to serving ABAWDs subject to time-limited participation. Retrieved from: http://www.fns.usda.gov/sites/default/files/Guide_to_Serving_ABAWDs_Subject_to_Time_Limit.pdf

⁴³ Funded SNAP E&T Pilot Projects were located in: Fresno County, Calif., Delaware, Georgia, Illinois, Kansas, Kentucky, Mississippi, Virginia, Vermont and Washington State.

⁴⁴ Gretchen Rowe, *Implementing the SNAP E&T Pilots: Challenges Encountered and Lessons Learned*. Mathematica. September 2021. Retrieved from: <https://files.eric.ed.gov/fulltext/ED616553.pdf>

⁴⁵ Courtney, Mark E., et al. “Findings from the California youth transitions to adulthood study (CalYOUTH): Conditions of youth at age 23.” *Chicago, IL: Chapin Hall at the University of Chicago* (2020).

⁴⁶ USDA, FNS. “Supplemental Nutrition Assistance Program (SNAP) – SNAP Provisions of the Fiscal Responsibility Act of 2023 – Questions and Answers.” July 27, 2023. Available at: <https://fns-prod.azureedge.us/sites/default/files/resource-files/SNAP-Provisions-of-the-Fiscal-Responsibility-Act-of-2023-Questions-and-Answers-1.pdf#page=2>.

⁴⁷ A transition plan must be developed at least 90 days before a young person who is age 18 or older leaves foster care.

⁴⁸ U.S.C.A. 675 (50) (H). Among other things, the transition plan should include “support services” needed to help make a successful transition to adulthood. SNAP is a vital “support service” and resource for a young person leaving foster care.

⁴⁹ State of California Health and Human Services Agency, Department of Social Services. (2013). All County Information Notice No. I-35-13. Retrieved from: http://www.dss.cahwnet.gov/lettersnotices/EntRes/getinfo/acin/2013/I-35_13.pdf

⁵⁰ John Burton Advocates for Youth, *THP-NMD & THP-Plus Annual Report 2018-19: Providing Affordable Housing and Supportive Services to Youth Transitioning from California’s Foster Care and Juvenile Probation Systems* (October 2019). Retrieved from https://jbay.org/wp-content/uploads/2020/12/THP-NMD_THP-PLUS_Annual_Report_FINAL.pdf.

⁵¹ For additional recommendations see Minoff, Elisa. “The Supplemental Nutrition Assistance Program (SNAP): A Vital Resource for Children, Youth, and Families.” Center for the Study of Social Policy, June 2023. Available at: <https://cssp.org/resource/snap-a-vital-resource/>.