POLICY BRIEF

Medicaid Community Engagement Requirements: Volunteering

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Arizona Food Bank Network

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EXECUTIVE SUMMARY

Beginning January 1, 2027, many Medicaid enrollees ages 19–64 in Arizona's "expansion population" will need to document 80 hours per month of work, job training, education, or community service to keep their healthcare coverage. In Arizona, Medicaid is called the Arizona Health Care Cost Containment System (AHCCCS, pronounced "access"). The expansion population covers adults who qualify for AHCCCS because of the Affordable Care Act's Medicaid expansion to include people with incomes up to 138 percent of the federal poverty level; previously, people qualified due to a disability, pregnancy, or other specified category.

A parallel expansion of Supplemental Nutrition Assistance Program's (SNAP) work requirements for able-bodied adults without dependents (ABAWDs) is already in effect. Both programs count volunteering toward the hours requirement, and both now share the same 80-hour standard.

The Arizona Food Bank Network's (AzFBN's) member food banks, agency partners, and statewide network of emergency food providers are trusted, accessible volunteer sites, including in rural areas that may have limited formal employment opportunities for AHCCCS participants. This brief summarizes the new requirements, estimates their reach in Arizona, and outlines how food bank volunteering can serve as a practical way for individuals to supplement existing work or community engagement hours. It closes with recommendations for ways food banks and other community-based organizations can support people's continued access to much-needed healthcare.

CONTENTS

- ☐ Background: H.R. 1 and Community Engagement Requirements (Page 2)
- ☐ What SNAP Work Requirement History Tells Us (Page 9)
- ☐ Recommendations and Actions (Page 12)

A NOTE ON FRAMING

This brief presents volunteering at a food bank as one way to help individuals round out existing work or community engagement hours, not as a standalone compliance strategy. **AzFBN and partner food banks never condition food access on volunteering. No client will be pressured or coerced by a food bank to volunteer in order to receive food or to maintain their public benefits.**

BACKGROUND: H.R. 1 AND COMMUNITY ENGAGEMENT REQUIREMENTS

On July 4, 2025, President Trump signed H.R. 1 (*One Big Beautiful Bill Act*) into law. The federal law made sweeping changes to both the SNAP and Medicaid that significantly affect low-income Arizonans and the organizations that serve them. SNAP's work requirements and Medicaid's community engagement requirements both require a minimum of 80 hours of a qualifying activity (additional details below) per month.

Medicaid (AHCCCS): Effective January 1, 2027

H.R. 1 requires states to implement community engagement requirements for most adults ages 19–64 enrolled in Medicaid expansion through the Affordable Care Act. To maintain eligibility, individuals must have a household income equal to or above $580 a month, qualify for an exemption, or document at least 80 hours per month of qualifying activity, including:

- Employment
- Job training or workforce development
- Enrollment in an educational program at least half-time
- Community service
- Or a combination of these

Roughly **417,000 of Arizona's 1.8 million AHCCCS enrollees** are in the expansion population. After applying exemptions and accounting for enrollees who are already working, however, AHCCCS estimates that about **100,000 Arizonans** are expected to be newly subject to the work/community engagement requirements when they take effect on January 1, 2027.

States must implement by January 1, 2027. States demonstrating a good-faith effort may request a delay to December 31, 2028, though **Arizona's AHCCCS program is not expected to seek a delay**. The U.S. Department of Health and Human Services (HHS) issued an interim final rule on June 1, 2026, detailing implementation requirements and exemptions, and the Center for Medicare and Medicaid Services (CMS) has allocated $200 million nationally to help states build the necessary infrastructure.

For the first calendar year of implementation (2027), AHCCCS will accept client statements (also known as "self attestations") to document compliance of community engagement requirements.

Some individuals may be exempt from the work requirements if they are:[1]

- An American Indian or Alaska Native
- A Veteran with a 100% total disability rating
- A caregiver for a child age 13 and younger, or for a person with a disability
- Under age 26 and you were in foster care at age 18
- Living with a mental health condition that affects your daily life
- Living with blindness or a disability
- Living with a physical, intellectual, or developmental disability that makes at least one everyday activity hard to do
- Living with a serious or complex health condition that makes it hard for you to meet work requirements
- Living with a substance use disorder that makes it hard for you to meet work requirements
- Getting treatment for drug or alcohol use
- Pregnant, or were pregnant in the last 12 months
- Already meet work requirements for SNAP (Nutrition Assistance) or TANF (Cash Assistance)
- In jail or prison, or were released in the last 3 months

Temporary exemptions may be available for those who:[2]

- Are getting care in a hospital or nursing home
- Must travel away from home for medical care for yourself or a dependent
- Live in an Arizona county with a disaster declared by the President
- Live in an Arizona county with high unemployment

Community partners can find additional information, fact sheets, and other resources to keep their communities informed at KeepMyAHCCCS.com.

[1] KeepMyAHCCCS.com. *Member FAQs: Who Is Exempt?* https://keepmyahcccs.com/#faq7

[2] See above.

Arizona has opted to offer all of the available (four) short-term hardship exemptions for individuals under specific circumstances.[3] These exemptions include:

- Receiving care in a hospital, nursing facility, psychiatric facility, or facility for people with intellectual disabilities.
- Traveling outside their community for an extended period to receive medical services for themselves or a dependent.
- Residing in a county where an emergency disaster was declared by the president.
- Residing in a county with high unemployment

Note: For the first two exemptions, individuals will need to provide information to AHCCCS at their application. For the last two exemptions, AHCCCS will automatically let individuals know if those exemptions apply to them.

SNAP (ABAWD Rules): Effective July 4, 2025

SNAP has long required able-bodied adults without dependents (ABAWDs) to work, participate in a qualifying job training program, or volunteer at least 80 hours per month to receive benefits beyond a three-month time limit. H.R. 1 significantly expanded these requirements by raising the age range from 18–54 to 18–64, narrowing the caregiver exemption to parents of children under 14, and eliminating categorical exemptions for veterans, individuals experiencing homelessness, and former foster youth. **Importantly, under SNAP, volunteering explicitly qualifies as a compliant activity for the ABAWD work requirement.**

In Arizona, Yuma County and four tribal communities (Cocopah Reservation, Hualapai Indian Reservation and Off-Reservation Trust Land, Maricopa (Ak Chin) Indian Reservation and Off-Reservation Trust Land, and the Salt River Reservation) have a waiver from the Food and Nutrition Administration (FNA, formerly known as Food and Nutrition Service) that waives the ABAWD time limit for the SNAP program due to high unemployment rates in each area. The waiver is set to expire in February 2027.

When an area is covered by the SNAP ABAWD waiver due to high unemployment rates, **Medicaid enrollees in that area are also exempt** from AHCCCS community engagement requirements.

[3] KeepMyAHCCCS.com. *H.R. 1 Information for Partners*. https://keepmyahcccs.com/partners/

ARIZONA CONTEXT: AHCCCS AND DES

AHCCCS administers Medicaid for roughly 1.8 million Arizonans—**about 1 in 4 state residents**—while the Department of Economic Security (DES) administers SNAP separately for approximately 500,000 Arizonans.

Of AHCCCS's total enrollment, an estimated **417,000** enrollees in the Medicaid expansion population (household incomes up to 138% of the federal poverty level) are expected to fall under the new work requirement when it takes effect January 1, 2027.[4] State health officials have separately cautioned that up to 400,000–500,000 AHCCCS enrollees could lose coverage if implementation is not carefully managed.[5]

Since SNAP work requirements were expanded last summer, in conjunction with other operational changes made to comply with H.R. 1, Arizona's total SNAP caseload declined by nearly 50 percent July 2025 and April 2026.[6] Although total participation has started to increase slightly in the months since, this decline is a signal that increased administrative burden—rather than the work requirement itself—may impede AHCCCS enrollees' ability to maintain their health coverage.

Overlap between SNAP and Medicaid Requirements

Both SNAP and Medicaid now use the same 80-hour-per-month standard for work and community engagement requirements. The two programs' work requirements have differences in exemptions and seasonal worker provisions, but both programs allow for community service and volunteering to meet the 80 hour requirement.

In the June 2026 final rule, CMS stated that its interpretation of Section 1902(xx)(9)(A)(ii)(VI)(bb) of the Social Security Act, added to H.R. 1 in 2025, is that individuals in households receiving SNAP benefits who are subject to SNAP work requirements must be exempt from Medicaid community engagement requirements. Specifically, CMS explained, "If an individual is in a household that receives SNAP benefits and is subject to a work requirement under the SNAP program, they meet the definition of a specified excluded individual and are therefore not an applicable individual subject to the Medicaid community engagement requirement."[7]

This alignment creates an opportunity for a single set of documentation to satisfy both programs simultaneously, reducing burden on participants, state agencies, and the community organizations supporting them both.

For awareness, the table on the next three pages details the overlap between requirements; however, eligibility determinations are made by state agency merit staff only.

[4] Davis-Young, K. "AHCCCS Launches Website to Help Arizonans Navigate New Medicaid Work Requirements." KJZZ. September 10, 2026.

[5] Boyd, L.M. "Leaders, Experts Gathered to Assess Arizona's Health Care Landscape." AZPM. February 26, 2026.

[6] Center on Budget and Policy Priorities. "Arizona's SNAP Participation is Plummeting—Far More Than Anticipated—as It Implements Megabill." April 8, 2026.

[7] Federal Register. *Medicaid Program; Community Engagement Requirement for Certain Individuals*. June 2026. https://www.federalregister.gov/d/2026-11094/p-340

Crosswalk of Exemptions in Medicaid and SNAP (1/3)				
Exemption Reason	Medicaid Work Requirement Policy	SNAP Work Requirement Policy*	Can Medicaid use SNAP information for exemption?	Can SNAP use Medicaid information for exemption?
Living with a Child in Same Household	Exempt if parent, guardian, caretaker relative, or family caregiver of a dependent under 14	Exempt if parent or other member of a household responsible for a dependent child under 14	With further eligibility worker review	With further eligibility worker review
Caring for a Child in Different Household	Exempt if providing regular care for a related child under 14; if child is unrelated, care must be 80 hours per month	Exempt if responsible for the care of a child under 6	With further eligibility worker review	With further eligibility worker review
Caregiver of a Disabled Individual	Exempt if parent, guardian, caretaker relative, or family caregiver of a disabled individual	Exempt if responsible for care of incapacitated person	With further eligibility worker review	With further eligibility worker review

***Since SNAP participants are exempt from the time limit if they are exempt from the general work requirement, this column combines the two.** *Continued next page...*

Crosswalk of Exemptions in Medicaid and SNAP (2/3)				
Exemption Reason	Medicaid Work Requirement Policy	SNAP Work Requirement Policy*	Can Medicaid use SNAP information for exemption?	Can SNAP use Medicaid information for exemption?
Medical Condition	Medical condition that substantially impairs ability to comply with the community engagement requirement	Medically certified as physically or mentally unfit for work, including if the individual is obviously mentally or physically unfit for employment as determined by the state agency.	Yes	Yes
Indian	Exempt if Indian, urban Indian, California Indian, or determined eligible for Indian Health Services (IHS)	Exempt if Indian, urban Indian, California Indian	Yes	With further eligibility worker review
Veteran	Exempt if veteran has total disability rating	Exemption for veteran status eliminated in H.R. 1 (but any Veterans Affairs disability rating exempts an individual as unfit for work)	N/A	Yes

***Since SNAP participants are exempt from the time limit if they are exempt from the general work requirement, this column combines the two.** *Continued next page...*

Crosswalk of Exemptions in Medicaid and SNAP (3/3)				
Exemption Reason	Medicaid Work Requirement Policy	SNAP Work Requirement Policy*	Can Medicaid use SNAP information for exemption?	Can SNAP use Medicaid information for exemption?
Participating in Rehab Program	Participating in drug addiction or alcoholic treatment and rehabilitation program	Participating in drug addiction or alcoholic treatment and rehabilitation program	Yes	Yes
TANF Participation (Temp. Assistance for Needy Families)	Exempt if compliant with TANF work requirements	Exempt if meeting TANF work rules	Yes	Yes
Pregnancy	Exempt	Exempt	Yes	Yes

***Since SNAP participants are exempt from the time limit if they are exempt from the general work requirement, this column combines the two.**

Source: Wagner, J., E. Bolen, A. Huguelet, and D. Rosenbaum. "Coordinating Medicaid and SNAP Work Requirements to Streamline Determinations." Center on Budget and Policy Priorities, September 2, 2026.

WHAT SNAP WORK REQUIREMENT HISTORY TELLS US

SNAP's experience with work requirements offers Arizona a valuable body of evidence—both cautionary and constructive—as AHCCCS prepares for 2027 implementation. General SNAP work requirements have existed since the 1970s, with ABAWD-specific time limits added in 1996 following the Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA) welfare reform. Requirements were suspended nationally from April 2020 through June 2023 during the COVID-19 public health emergency, then reinstated and expanded under the Fiscal Responsibility Act of 2023 before H.R. 1 expanded them further.

Prior to H.R. 1, an estimated 147,000 Arizonans were subject to the SNAP ABAWD time limit under the expanded rules.[8] Research consistently finds that the majority of those subject to work requirements are already working, in school, or qualify for an exemption; coverage losses are driven primarily by documentation and reporting failures, not genuine non-compliance.[9]

Documented Challenges

- Reporting burden: Compliant individuals regularly lose benefits due to missed paperwork or interview deadlines, not failure to work or engage.
- Awareness gaps: Mail-heavy outreach has consistently failed to reach transient and low-income populations.
- Volunteer hour documentation: No standardized form exists for nonprofit volunteer sites; documentation can be inconsistent and may not be accepted.
- Geographic access: Rural Arizona communities often lack sufficient employment and training opportunities or community service sites, limiting practical compliance options.
- Variable work hours: Many low-income adults in gig, seasonal, or part-time work cannot reliably meet 80 hours every month, even when they want to.

[8] Monroe, A. "New SNAP Work Requirements Could Add Pressure to Food Banks." KJZZ. January 14, 2026.

[9] Bauer, L. and C. East. *A Primer on SNAP Work Requirements*. Washington, DC: The Hamilton Project, Brookings Institution, April 2025.

What Has Worked

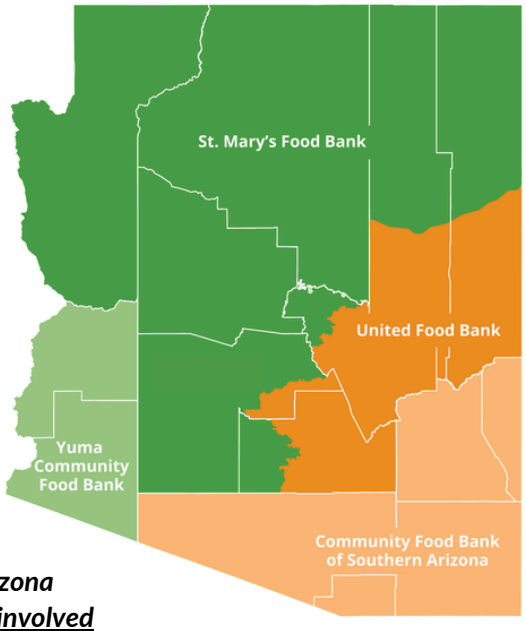
- Proactive data matching: Matching wage records, unemployment insurance data, and SNAP or TANF (Temporary Assistance for Needy Families, or cash assistance) to identify compliance without requiring individuals to self-report.
- Community-based organizations recognized as approved volunteer sites with clear, standardized documentation protocols.
- Multi-channel outreach through text, email, in-person at benefit access points, or phone is significantly more effective than mail-only approaches.

FOOD BANK VOLUNTEERING AS A COMMUNITY ENGAGEMENT ACTIVITY

Food banks are positioned to serve as community engagement sites under both SNAP and Medicaid requirements. AzFBN's regional member food banks—Community Food Bank of Southern Arizona, St. Mary's Food Bank, United Food Bank, and Yuma Community Food Bank—have service areas that cover all of Arizona's 15 counties, including rural and underserved communities where formal employment opportunities may be limited. They already serve many of the individuals enrolled in SNAP and AHCCCS, making them a natural, trusted connection point for compliance support.

Volunteering at a food bank already explicitly qualifies as a compliant activity under SNAP's ABAWD rules. When Medicaid community engagement requirements take effect, volunteering at a food bank will also be a qualifying activity.

Beyond compliance, food bank volunteering has documented social-determinants-of-health benefit—including reduced social isolation, skill development, and connections to employment resources—that support efforts toward self-sufficiency.



For more information about volunteering within the Arizona Food Bank Network, please visit: azfoodbanks.org/get-involved

HOW TO VOLUNTEER AT ARIZONA FOOD BANKS

While each AzFBN member food bank operates independently, volunteering remains an option for individuals looking to complete supplemental hours toward work requirements. Each member food bank uses its own internal system to log volunteer hours and can provide documentation—i.e., signed hour logs, noted hours signed off on letterhead, timesheets, or reports—to clients to meet verification standards. If state agencies allow a standardized verification form, AzFBN can develop one. However, we recommend preserving flexibility to ensure timely application processing and allow clients to demonstrate compliance through the documentation method that is most accessible to them.

Volunteer shifts are most plentiful in the summer months, though opportunities are available year-round; based on seasonality and population fluctuations, positions become more limited in winter and spring. For the newly expanded SNAP ABAWD population, some locations allow children ages 12 and up to volunteer with a parent or guardian. Structured shifts typically involve sorting food, building baskets or boxes, and loading or unloading deliveries; at the Community Food Bank of Southern Arizona, volunteers can also help at the community farm and farmers' market. Shift types offer flexible hours for individuals looking to supplement work-requirement hours.

Volunteering at Arizona Food Banks		
Community Food Bank of Sourthern Arizona	Click here to sign up	Serving Pima, Cochise, Graham, Greenlee, and Santa Cruz counties
St. Mary's Food Bank	Click here to sign up	Serving Metro Phoenix, Mohave, Yavapai, Coconino, Navajo (Northern), Apache (Northern), Pinal (Western), Maricopa (Western) Counties
United Food Bank	Click here to sign up	Serving Eastern Maricopa, Gila, Pinal, and southern Navajo and Apache counties
Yuma Community Food Bank	Click here to sign up	Serving Yuma and La Paz counties

RECOMMENDATIONS AND ACTIONS FOR FOOD BANKS AND PARTNER ORGANIZATIONS

- Raise awareness among clients that volunteering is one way to comply with new AHCCCS work requirements and existing SNAP work requirements.
- Ensure volunteer-facing materials explicitly state that volunteering is optional and does not affect food access.
- Train volunteer coordinators on the basics of SNAP and AHCCCS community engagement requirements so they can accurately answer participant questions.
- Utilize resources shared on keepmyahcccs.com to spread awareness for members on upcoming changes.

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