



for every child

BRIDGING THE GAP

Ensuring Food Security for Youth Aging Out of the Foster Care System Through SNAP

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The bipartisan 2023 Fiscal Responsibility Act provided a SNAP work exemption for youth aging out of the foster care system. H.R. 1 reversed this exemption as of July 2025, placing an estimated 15,000 to 20,000 former foster youth each year at heightened risk of food insecurity.

POLICY SOLUTIONS AT A GLANCE

- The Federal Government should reinstate work and training requirement waivers that allow youth aging out of the foster care system to continuously access SNAP benefits
 - States should offer high quality, youth friendly extended foster care services to youth aging out of care
 - States should align transition services for youth aging out of foster care with Federal SNAP work and training requirements to ensure youth are eligible for SNAP benefits
 - Federal and state governments should protect data on food insecurity, particularly data on food insecurity among youth aging out of foster care
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BACKGROUND

The Supplemental Nutrition Assistance Program (SNAP) is the largest federal nutrition program in the United States, serving roughly 42 million individuals in February 2025. It provides support to low-income individuals and families to purchase food, playing a critical role in reducing food insecurity and supporting healthy development. Roughly 40% of SNAP recipients are youth, making the program essential to ensuring the health of America’s young people.¹

In July 2025, H.R. 1—a federal budget bill also known as the One Big Beautiful Bill Act—reversed a 2023 bipartisan exemption that allowed youth aging out of the foster care system to receive SNAP benefits regardless of work or school status through age 24. As a result, an estimated 15,000-20,000 former foster youth per year are now at risk of losing access to essential nutrition assistance.² Youth aging out of the foster care system are one of the highest risk populations of youth in the United States, facing substantially greater rates of unemployment, housing instability, and poverty than their peers.^{3,4}

WHAT DOES IT MEAN TO AGE OUT OF THE FOSTER CARE SYSTEM?

In 2024, there were approximately 330,000 children and youth in the U.S. Title IV-E foster care system, which is the largest joint state and Federal foster care program in the U.S. serving all 50 states, as well as U.S. tribes and territories.² Title IV-E programs are typically administered by state or Tribal agencies responsible for child and family welfare, with guidance and regulations set by the Federal Government.² While the aims of foster care are focused on reunifying children with their families, or adoption when reunification is not possible, some children may reach age 18 without ever reunifying or being adopted. When a child reaches age 18 without reunification or adoption, this is referred to as “aging out” of foster care and generally marks a period in which children exit the foster care system into independence. The estimated prevalence of aging out of foster care in FY 2024 by state is provided in Appendix Table 1.

Nationally, around 15,000 to 20,000 youth “age out” of foster care per year.² Much like many children facing adulthood, children that age out of the foster care system often struggle with early independence. Unlike many other children, former foster youth often have no family or adults providing ongoing support to them. Given this stark upheaval, youth who have aged out often face hardships such as housing instability or homelessness, school dropout, and unemployment.⁵ These challenges are often compounded by histories of trauma and post-traumatic stress disorder. An estimated 90% of children in the foster care system have experienced at least one trauma,³ and post-traumatic stress disorder rates are 2-3 times greater among foster care youth compared to the general child population.⁴

SUPPORTING FORMER FOSTER YOUTH: EXTENDED FOSTER CARE

Many states have enacted approaches to support children who have aged out of foster care beyond age 18 through additional funds from the Federal Government under Title IV-E, often referred to as extended foster care.² Extending foster care provides youth with a high level of ongoing support after age 18, usually through age 21. Through this extension, youth retain legal status as a foster youth, and often receive supervised housing, financial support, and case management, among other supports. Additionally, many states and private organizations offer a lower level of support through programs that youth can opt into, such as workforce training, education vouchers, and transition housing. Programmatic support may come with a case worker, but often with less supervision and less financial support than traditional foster care.

Services and support for youth aging out of the foster care system vary widely by state (see Appendix) and by individual circumstances. While some states offer resources such as housing assistance and financial literacy training, access often depends on funding availability and whether youth are aware of these programs. Preparation for the transition out of foster care also differs considerably, as some caregivers or case workers provide extensive guidance and support while others offer little to none. At the federal level, certain protections exist, including Medicaid coverage for former foster youth up to age 26⁶ and the Supplemental Nutrition Assistance Program (SNAP) to offset food insecurity. However, policy changes following the passage of H.R. 1 in July 2025 have shifted the accessibility of SNAP for former foster youth.

SUPPORTING FORMER FOSTER YOUTH: SNAP WORK REQUIREMENT AND TIME-LIMIT EXEMPTIONS

To be eligible for SNAP, individuals ages 16 and older are subject to work requirements unless they are exempt. In general, SNAP work or training requirements include documentation of registering for work, participating in a SNAP employment and training (E&T) program,⁷ or taking a job when offered and refraining from quitting a job or voluntarily working less than 30 hours a week.⁸ Some individuals have historically been exempted from these work requirements, such as those who have a disability and caregivers of young children.⁹ Individuals who are enrolled in school or training programs may also be exempt from work requirements; however, additional eligibility rules apply to college students.¹⁰ Of note, exemption rules were modified in H.R. 1, such as age thresholds for those who qualify for various exemption statuses.¹⁰

Additional work requirements apply to able-bodied individuals ages 18 and older who do not have dependents or qualify for an exemption. These individuals must work, volunteer, or participate in a work training program for at least 80 hours a month in addition to meeting general SNAP work requirements described above. If unable to document compliance with these additional work requirements, able-bodied individuals can only receive SNAP benefits for three-months in a 36-month period—in other words, their benefits are time-limited.

A SNAP time limit exemption was granted for youth who have aged out of the foster care system (i.e., were in foster care at the time of their 18th or 21st birthday, depending on the state) up to age 24 in the Fiscal Responsibility Act of 2023.^{11,12} Beginning September 1st, 2023, youth who had aged out of the foster care system were able to continuously access SNAP benefits beyond the three-month time limit regardless of their work, training, or school enrollment status. This exemption was eliminated when H.R. 1 became public law on July 4th, 2025.

In the absence of the SNAP time limit exemption, youth who have aged out of the foster system at age 18 or older, and who do not meet other exemption criteria or are unable to meet monthly work requirements, are at high risk of experiencing food insecurity, given the overwhelming rates of housing instability and unemployment that affect this population. Without nutrition assistance from programs such as SNAP, many youths who have exited the foster care system may struggle to have their basic needs met, amplifying uphill battles to overcome hardships and become self-sufficient.

DATA COLLECTION BARRIERS WITHIN THE SNAP AND FOSTER CARE SYSTEMS

Because SNAP and foster care data systems are complex and often fragmented, it is challenging to accurately assess how many young people aging out of foster care depend on SNAP to meet their basic needs. Three key data collection and governance barriers within these systems are: (1) instability in federal food insecurity data collection, (2) limited and inconsistent identification of former foster youth within SNAP administrative systems, and (3) persistent legal, technical, and governance obstacles to linking child welfare and SNAP data.

First, the federal data infrastructure used to contextualize SNAP reliance is in flux. National estimates of food insecurity have historically relied on the Current Population Survey-Food Security Supplement, which provides annual, comparable measures of household and child food insecurity and is widely treated as the federal gold standard.¹³ In 2025, USDA announced it would no longer publish its annual Household Food Security in the United States Report.¹⁴ This disruption weakens the ability to benchmark former foster youths' food hardship against broader food insecurity trends while SNAP eligibility and work requirement rules are simultaneously evolving.¹⁵ As a result, analysts and policymakers face increasing uncertainty about the size and severity of food hardship among former foster youth, independent of SNAP receipt.

Second, SNAP data systems collect information needed to determine eligibility and benefit levels, but they do not universally include a reliable indicator of foster care history. Foster care status is used for narrow policy purposes, such as the Fiscal Responsibility Act of 2023 SNAP work requirement time limit exemption.¹² As a result, foster care experience may be recorded only when needed to apply a specific exception, rather than as a standard background characteristic. This creates substantial measurement gaps. Identification often relies on self-disclosure and documentation; however, some youth may lack adequate documentation of foster care status, and administrative burden and stigma may further discourage self-disclosure.¹⁶ Federal guidance directs states to use information from other programs—such as Medicaid—to verify foster care history, acknowledging that SNAP administrative systems alone are insufficient.¹⁷

Third, while linking child welfare administrative data to SNAP records is the most accurate way to estimate SNAP reliance among youth who age out of foster care, such linkage remains difficult to implement and sustain. Data sharing across state agencies faces recurring barriers, including privacy and legal constraints around personally identifiable information, inconsistent identifiers across systems, data quality limitations, and the administrative burden of negotiating and maintaining interagency agreements.¹⁸ To add to this complexity, child welfare systems are state-administered and often county-operated, while SNAP is state-administered using highly variable eligibility systems. A federal descriptive study of state child welfare data linkages found wide variation in whether and how states link child welfare data to other systems such as SNAP and Medicaid.¹⁹ States may also face legal challenges when sharing data with the Federal Government.

Taken together, these barriers mean that policymakers and advocates currently lack a reliable, national estimate of how many youth who age out of foster care rely on SNAP as a pathway to self-sufficiency. Addressing these barriers would help identify former foster youth who would benefit from streamlined, uninterrupted access to SNAP through policies such as work requirement exemptions as well as high-quality extended foster care services.

CALL TO ACTION

The Federal Government Should Reinstate Work Requirement and Time Limit Exemptions

The federal government should reinstate waivers from SNAP work and education requirements and time limit exemptions for youth who have aged out of foster care, similar to Medicaid work requirement waivers for former foster youth.²⁰ This policy recognizes the severe and well-documented high risk for food insecurity, housing instability, unemployment, and disrupted education during the transition to adulthood, particularly in the years immediately following exit from care.²¹ Given that many former foster youth lack stable housing, transportation, and/or financial support, good-faith efforts to comply with documentation requirements and strict SNAP work or education mandates are difficult to achieve. Without waivers, these barriers can lead to abrupt loss of nutrition assistance at a moment when consistent access is essential for having successful transitions and developing self-sufficiency.

Reinstating federal waivers would provide a uniform national safeguard for former foster youth, particularly in states that do not offer extended foster care or have low participation in Title IV-E extended care. Allowing foster care exit status to serve as the basis for a time-limited SNAP work requirement exemption—without adding burdensome documentation requirements—would reduce benefit churn, ease administrative demands on both youth and state agencies, and help prevent wrongful terminations caused by verification barriers. This approach aligns with strong evidence that food insecurity undermines educational attainment, workforce participation, and long-term economic stability, and reflects the government’s unique responsibility to young people for whom it previously served as legal custodian.

States Should Administer High-Quality, Youth Friendly Extended Foster Care to Youth Over 18

Extending foster care under Title IV-E can stabilize SNAP access for youth transitioning out of care, because extended foster care keeps young adults under state supervision with structured education, training, and employment opportunities that align with SNAP work and training requirements or education exemptions. Importantly, extended foster care provides youth that have aged out with stable support through case workers to ensure youth are connected to available resources. Extended foster care also provides youth with the legal designation of a “foster child,” which means the state retains legal custody and duty of care for the child, ensuring the state is obligated to support the child’s safety and stability.

Most states have adopted the Title IV-E option to extend foster care past age 18, but a small number have not (see Appendix Table 1). Some states have developed state level programs for youth that have aged out of foster care, but many without the legal designation of a “foster child.” In these states that have not implemented Title IV-E extended foster care, youth who age out at 18 face greater risk of losing SNAP benefits if they are not working, enrolled in school, or participating in qualifying training activities, because there is no ongoing foster care status to anchor SNAP work or education exemptions. By contrast, states with extended foster care can leverage structured participation under Title IV-E to meet SNAP requirements more readily and reduce abrupt benefit loss as youth transition to adulthood.

However, the availability of extended foster care does not automatically guarantee access to SNAP. In some states, extended foster care programs have complex eligibility and participation requirements, such as ongoing court involvement, education or employment mandates, and frequent documentation, which can create barriers to enrollment. As a result, participation in extended foster care has historically been low. In the most recent available data, no state reports every eligible child enrolled in extended foster care and some states report enrollment rates below 30%.²² To be effective, states must ensure that extended foster care programs are youth-friendly and accessible. States must reduce barriers to participation by providing flexibility in eligibility requirements. Additionally, outreach to foster youth in their late teens should be mandatory to ensure all youth in foster care are aware of the option to enter extended foster care.

States Should Align Transition Services with SNAP Employment & Training Requirements

States should explicitly align Title IV-E funded transition-to-adulthood services, such as extended foster care, with SNAP Employment & Training (E&T) requirements to prevent unnecessary loss of food assistance among youth aging out of foster care. Many of the activities offered to youth aging out of the foster care system—such as postsecondary education, vocational training, subsidized employment, job readiness, and structured life-skills programming—are functionally equivalent to SNAP-qualifying work or training activities. Formal recognition of these services within state SNAP E&T plans would allow transition-age youth to meet federal work requirements while remaining engaged in developmentally appropriate supports. Both programs offered through extended foster care and supportive services offered to youth who have aged out of foster care should be eligible to meet SNAP E&T requirements.

Operationally, this would require coordination between child welfare and SNAP agencies to issue clear guidance that participation in transition-to-adulthood programs satisfies SNAP work requirements under H.R. 1. States can streamline eligibility by allowing child welfare case plans or participation records to serve as SNAP verification, reducing administrative burden on youth and frontline staff. Automatic referral of eligible youth to SNAP E&T at age 18 or upon entry into extended foster care could further reduce gaps in coverage.

This approach leverages existing federal investments rather than creating new programs, minimizes benefit churn, and reflects the reality that youth transitioning from foster care are already engaged in structured activities designed to promote long-term self-sufficiency. Aligning these systems would help ensure that compliance with SNAP rules does not undermine the very transition support intended to stabilize young people as they move toward adulthood.

Protect Data on Food Insecurity Among Former Foster Youth

To ensure that changes to SNAP eligibility under H.R. 1 are implemented and evaluated responsibly, state and county data collection efforts on food insecurity must be made more capable of identifying youth who have aged out of foster care. Although this is a relatively small population, young people transitioning out of foster care face exceptionally high risks of food insecurity and instability. As children formerly in the care of the state, the government has a unique responsibility toward their well-being, given its role as custodian during childhood. Without robust food insecurity data that can capture this group, policymakers will be unable to assess whether H.R. 1 meaningfully improves or undermines food security outcomes for one of the most vulnerable populations of youth affected by SNAP policy changes.

In parallel, USDA and state human services agencies should address administrative data gaps that prevent reliable identification of former foster youth within SNAP systems. This can be done by standardizing the collection of foster care history in SNAP eligibility systems. This small step would allow states to more accurately estimate SNAP participation and unmet food needs among youth who age out of foster care, strengthen oversight of H.R. 1 implementation, and support evidence-based refinements to nutrition policy for this population of youth at exceptionally high risk of hunger.

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APPENDIX

Table 1. End of Foster Care Agency Involvement by State, as of Federal fiscal year 2024

State	Count aged out (FFY 2024)	Percent of exits (FFY 2024)	End of Agency Involvement
United States	15,355	9%	N/A
Alabama	205	6%	21
Alaska	<10	–	21
Arizona	635	9%	21
Arkansas	182	8%	21
California	2,438	12%	21
Colorado	171	6%	21
Connecticut	136	10%	21
Delaware	36	11%	18; court oversight and independent living support to age 21
Florida	739	7%	21; court jurisdiction may extend to age 22 for youth with a disability
Georgia	584	11%	21
Hawaii	20	3%	21
Idaho	59	5%	21
Illinois	258	4%	21
Indiana	307	5%	21
Iowa	210	8%	19; voluntary programs may extend some services after age 18
Kansas	428	16%	21
Kentucky	370	8%	21
Louisiana	82	3%	21; to 26 for some Chafee transition services
Maine	37	4%	21; extension to age 22 in some circumstance
Maryland	252	17%	21
Massachusetts	288	8%	22
Michigan	537	15%	21
Minnesota	342	8%	21
Mississippi	52	2%	21
Missouri	346	8%	21
Montana	65	5%	18; youth in secondary school may remain in foster care after age 18
Nebraska	146	8%	21
Nevada	41	2%	21
New Hampshire	77	12%	21
New Jersey	154	10%	21
New Mexico	67	7%	21
New York	627	10%	21

North Carolina	292	6%	21
North Dakota	46	6%	21
Ohio	1,319	14%	21
Oklahoma	186	5%	18; voluntary services available up to age 21
Oregon	165	7%	21
Pennsylvania	479	8%	21
Rhode Island	87	12%	21
South Carolina	271	10%	21
South Dakota	78	8%	21
Tennessee	608	12%	21
Texas	821	9%	21
Utah	102	8%	21
Vermont	34	7%	22
Virginia	455	20%	21
Washington	*	*	21
West Virginia	242	6%	21
Wisconsin	206	6%	21
Wyoming	*	*	21
Federally Recognized Tribes	19	5%	-

**At the time of publication, Washington and Wyoming have not submitted data to the AFCARS reporting system*

Data Sources: *The Adoption and Foster Care Analysis and Reporting System (AFCARS), Administration for Children and Families, U.S. Department of Health and Human Services; Project Lifeline, State-by-State Age-Out Database for Children in Foster Care; Child Welfare Information Gateway (2022). Extension of foster care beyond age 18. Washington, DC: U.S. Department of Health and Human Services, Children's Bureau; Juvenile Law Center (2024). National Extended Foster Care Review: State laws and policies governing foster care beyond age 18. Philadelphia; Annie E. Casey Foundation (2019). New Mexico Legislature extends foster care to age 21; New Mexico Children, Youth and Families Department. Fostering Connections program; Imua 21 (Hawai'i Department of Human Services). Eligibility, Delaware General Assembly (2012). Chapter 185, 78 Del. Laws (Extended jurisdiction for youth transitioning from foster care); Indiana Department of Child Services. Older Youth Initiatives.*