



The Supplemental Nutrition Assistance Program (SNAP) in Tennessee

January 20, 2026

Key Takeaways

- The Supplemental Nutrition Assistance Program (SNAP) provides low-income children and adults with monthly benefits to pay for groceries.
- Eligibility for SNAP is based on income/asset limits, citizenship/residency rules, and work requirements—all set at the federal level.
- SNAP benefit amounts are determined by a federal formula that considers household size, income, and a maximum benefit amount tied to an estimate of a low-cost, nutritious diet.
- Nearly 700,000 Tennesseans receive monthly SNAP benefits—or about 9.6% of the state’s population and over 80% of those eligible.
- The federal One Big Beautiful Bill (OBBB) Act changed SNAP work requirements and state-federal cost-sharing requirements.

Nutrition is important for Tennesseans’ health and well-being. The Supplemental Nutrition Assistance Program (SNAP) is the largest federal program focused on nutrition. This policy primer explains SNAP, participation and funding in Tennessee, and recent changes under the One Big Beautiful Bill (OBBB) Act.

SNAP Overview

The Supplemental Nutrition Assistance Program (SNAP) is a joint federal-state program that helps low-income households afford nutritious food and maintain food security. Formerly called food stamps, SNAP is administered federally by the U.S. Department of Agriculture (USDA) and by the Tennessee Department of Human Services (TDHS) at the state level.(1) USDA sets eligibility requirements within federal law, while TDHS is responsible for enrolling individuals, verifying eligibility, and issuing monthly benefits. (2) The federal and state governments share in administrative costs, and the federal government covers the full cost of benefits. However, recent federal changes will shift a portion of benefit costs to states that do not meet a payment accuracy benchmark.

Recipients receive monthly SNAP payments via electronic benefit transfer (EBT) (i.e., a debit card) to buy groceries at one of over 6,800 SNAP-authorized retailers in Tennessee. (3) (4) Benefits can be used for groceries but not alcohol, tobacco, medicines, live animals, and non-food items (e.g., pet food, cleaning supplies, hygiene items). (5) In December 2025, the USDA approved Tennessee's request to restrict SNAP purchases of items such as soda and candy—joining 12 states that already had similar restrictions.(6) (7)

Federal funding for SNAP-supported nutrition education programs ended in October 2025. The SNAP-Ed program supported classroom instruction, demonstrations, and other education materials and activities about healthy diets for SNAP recipients. (9) Under new federal law, however, federal funding for the program was terminated beginning in federal FY (FFY) 2026.

SNAP Eligibility

Eligibility for SNAP is based on income/asset limits, citizenship/residency rules, and work requirements—all set at the federal level.(10) Highlights are discussed below.

Income/Asset Limits

SNAP income and resource calculations are complex and vary based on individual circumstances. Most households must meet both an asset limit and two income tests—one for gross monthly income and another for net income. Pending approval from the Tennessee General Assembly, TDHS is in the process of changing state-level “broad-based categorical eligibility” (BBCE) rules which would simplify and align SNAP income limits with the Temporary Assistance for Needy Families (TANF) program. (12) Current requirements include:

- **Gross Income Limit** — A household's gross monthly income cannot exceed 130% of poverty—or \$3,483 for a family of four. Gross income includes income from all sources (i.e., wages, cash assistance, Social Security, unemployment, and child support) before any deductions.
- **Net Income Limit** — Net monthly income cannot exceed 100% of poverty—or \$2,680 for a family of four. Net income estimates the money a family has available to afford basic expenses like food. It excludes things like the family's home, child support payments, a dependent care deduction, and a 20% deduction for earned income (i.e., work). (13)
- **Resource Limit** — Assets are limited to \$3,000 for most households and \$4,500 for households with a person with a disability or age 60+. Countable assets include cash on hand, money in checking and savings accounts, certificates of deposits, stocks, bonds, property not up for sale, and lump-sum payments. It does not include the family's home, retirement plans, and resources from other federal benefit programs like Supplemental Security Income (SSI) and TANF.(14)
- **Reverification** — To continue receiving benefits, most SNAP recipients must recertify their eligibility as frequently as every 4-6 months.(11)

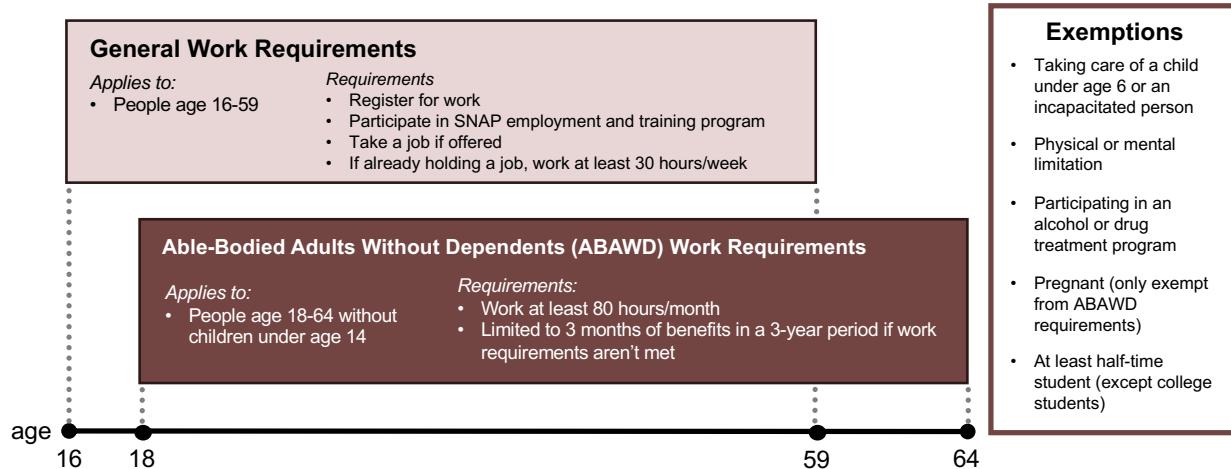
Work Requirements

SNAP has two work requirements—a general work requirement and a so-called “ABAWD” work requirement: (Figure 1)

- **General Work Requirement**—Able-bodied recipients ages 16-59 must meet a general work requirement to receive SNAP, including registering for work or participating in an employment or training program. Employed recipients cannot quit a job without another in place or voluntarily reduce work hours without reasonable cause, and unemployed recipients must accept any suitable employment offers.
- **ABAWD Work Requirement**—Additional requirements also apply to able-bodied adults without dependents (ABAWD), who are otherwise subject to a three-month limit on benefits. Under the ABAWD requirement, recipients ages 18-64 without a dependent under 14 must report at least 80 hours of work per month to receive more than three months of benefits in a three-year period. (15) (16) Prior to the passage of the OBBB Act, the ABAWD requirement applied to recipients ages 18-54 without a dependent under 18. (17) (18) National estimates project that approximately 52,000 Tennesseans will now have to meet the ABAWD work requirement to continue receiving SNAP benefits. (19) (20)
- **Special Rules**—Special rules and exemptions apply to older adults ages 60+ and individuals with disabilities (e.g., exemption from gross income test). (21) The OBBB Act removed prior work requirement exemptions for veterans, people experiencing homelessness, and people ages 24+ who aged out of foster care. (17) (18)

Figure 1. The Supplemental Nutrition Assistance Program (SNAP) Has Two Types of Work Requirements

General Work Requirements vs. ABAWD Work Requirements



Note: If a SNAP recipient is exempt from general work requirements, he or she is also exempt from ABAWD work requirements.

Source: U.S. Department of Agriculture, Food and Nutrition Service(16)

Additional Requirements

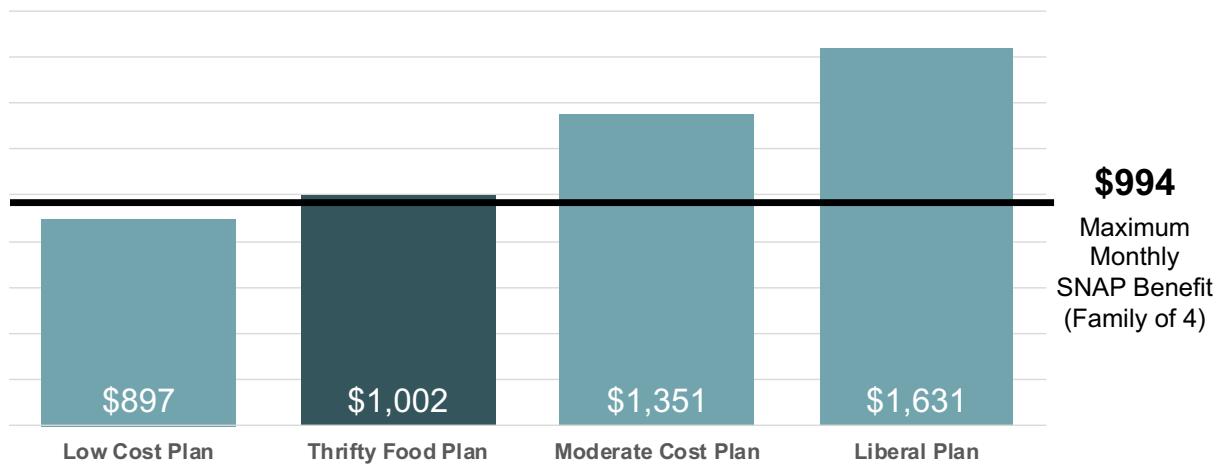
Certain targeted populations are ineligible for SNAP benefits or must meet additional requirements. For example, people living in the U.S. without legal authorization (i.e., illegal/undocumented immigrants) and felons convicted of certain drug-related offenses are ineligible. Additionally, people cannot qualify for benefits for the first time if they are on strike, but people who were already enrolled in SNAP before the strike may continue to receive benefits if they still meet the eligibility requirements. College students can only receive SNAP if they work at least 20 hours per week, enroll in work-study, care for dependents, or receive TANF. (23)

SNAP Benefits

The basis for SNAP benefit amounts is the Thrifty Food Plan (TFP)—USDA's estimate for a low-cost nutritious diet. USDA publishes four types of food plans—each estimating different cost levels for a healthy diet.(24) The cost of each is based on food prices, food consumption data, consumption patterns, and dietary guidelines for different age groups.(25) The TFP is the second lowest-cost of USDA's four plans (Figure 2).

Figure 2. SNAP Benefits are Benchmarked to USDA's Second Lowest-Cost Estimate of a Healthy Diet

Estimated Monthly Food Costs Under USDA's Food Plans (2025)



Note: The amounts listed are for USDA's reference family—i.e., a household of 4 with a male and female ages 20–50 and two children ages 6–8 and 9–11.

Source: U.S. Department of Agriculture, Food and Nutrition Service(24)

SNAP benefit amounts are determined by a federal formula that considers household size, income, and a maximum benefit tied to the Thrifty Food Plan. The maximum benefit amount is tied to the cost of the TFP for a reference family of four—with benefits tapering down as income increases. The SNAP formula expects people to spend about 30% of their net income on food, so a household's SNAP benefit is equal to the difference between that amount and the TFP cost.(27) For example, a family of 4 with a \$2,000 net monthly income would receive \$394 a month, which equals the maximum benefit (\$994) minus 30% of their net income (\$600) (Table 1 and Figure 3).

Table 1. Maximum Monthly SNAP Benefit

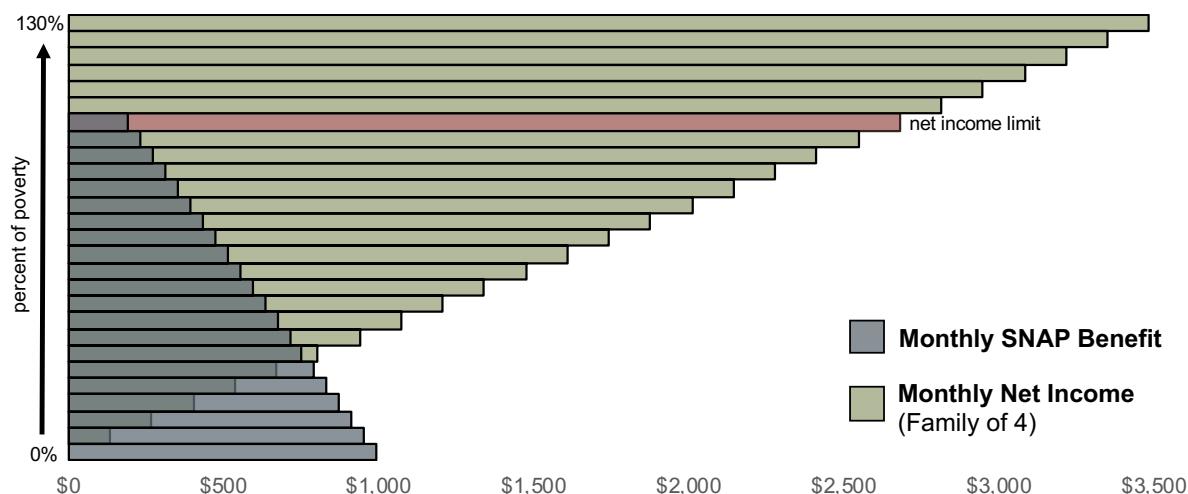
Federal Fiscal Year 2026 (October 1, 2025 through September 30, 2026)

Household Size	Maximum Monthly Benefit
1	\$298
2	\$546
3	\$785
4	\$994
5	\$1,183
6	\$1,421
7	\$1,571
8	\$1,789
Each additional person	+\$218

Source: U.S. Department of Agriculture, Food and Nutrition Service. (22)

Figure 3. SNAP Benefit Amounts Are Highest for the Lowest Income Households

SNAP Benefit Amounts by Net Income (2025)



Source: U.S. Department of Agriculture, Food and Nutrition Service. (22)

While benefits are adjusted annually for inflation, any future updates to the Thrifty Food Plan must be cost-neutral. Under a 2018 federal law, the TFP must be reevaluated every five years. (25) The last revision occurred in 2021 and resulted in a 21% increase to the maximum benefit. Under the OBBB Act, however, future updates to the TFP cannot increase benefit amounts aside from inflationary adjustments. (28)

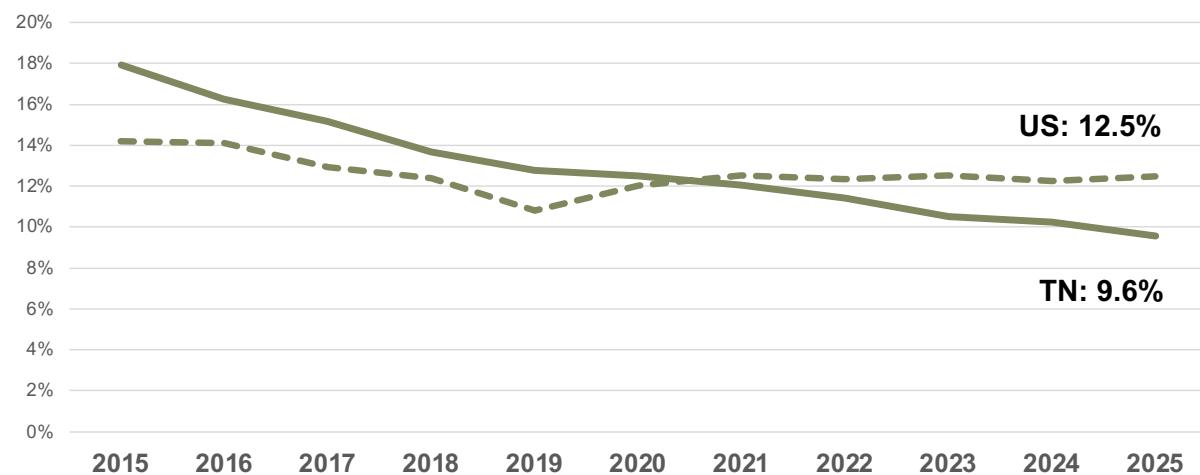
SNAP Participation in Tennessee

Nearly 700,000 Tennesseans receive monthly SNAP benefits—or about 9.6% of the state's population and over 80% of those eligible.(29) (30) Highlights of participation include:

- **Enrollment Trends** — SNAP enrollment in Tennessee has steadily declined over the past decade—falling by nearly 42% from almost 1.2 million recipients in September of 2015 to just under 700,000 in September of 2025. During this time, overall participation fell from 17.9% of all Tennesseans to 9.6% (**Figure 4**). Meanwhile, participation among eligible individuals also declined. An estimated 84% of eligible individuals received benefits in 2022, down from 94% in 2015 (**Figure 5**).^{(31) (32) (33) (34)}
- **Geographic Variation** — Participation varies significantly across Tennessee’s 95 counties, from a low 1.2% of all Williamson County residents to a high of 19.9% of Lake County residents (**Figure 6**).
- **Recipient Characteristics** — In 2024, 51% of SNAP households in Tennessee fell below the poverty line, 50% included children, and 51% had at least one household member with a disability (**Figure 7**).
- **Average Benefits** — On average, Tennessee disbursed about \$146 million in benefits each month between January and November 2025, with each household receiving a monthly average of over \$400 (**Figure 8**).

Figure 4. Tennesseans’ Participation in SNAP Has Declined Over the Past Decade

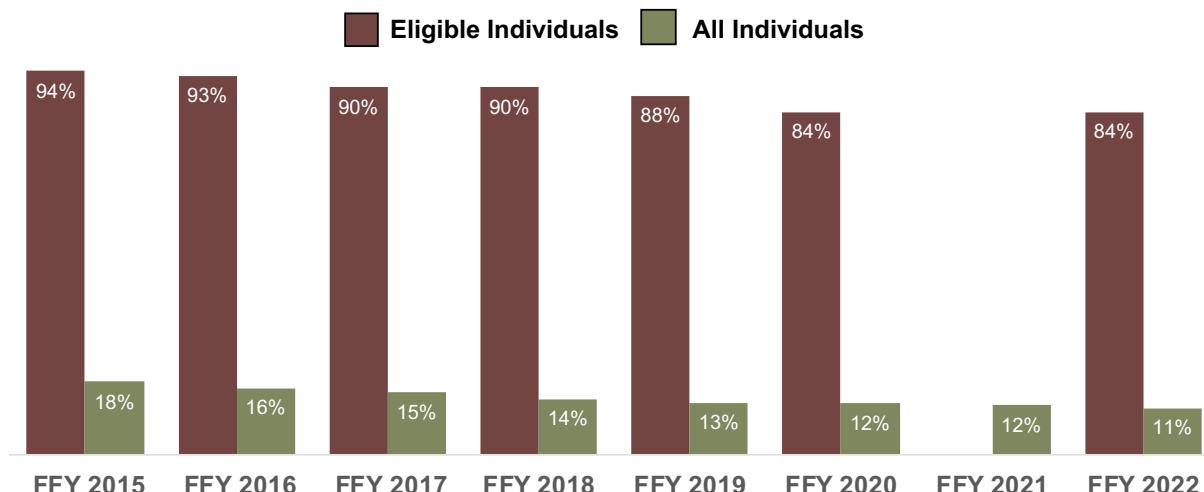
Percentage of Residents Participating in SNAP (2015-2025)



Source: Tennessee Department of Human Services, September SNAP Enrollment Reports 2015-2025 (31); U.S. Department of Agriculture SNAP Monthly Participation and Benefit Summary Reports FFY 2015- FFY 2025) (32); U.S. Census Bureau National Intercensal Population Total 2010-2020 (33); and U.S. Census Bureau National Population Totals 2020-2024 (34)

Figure 5. About 84% of Eligible Tennesseans Received SNAP in 2022

SNAP Participation Rate of Eligible Individuals vs. All Individuals in Tennessee (FFY 2015- FFY 2022)

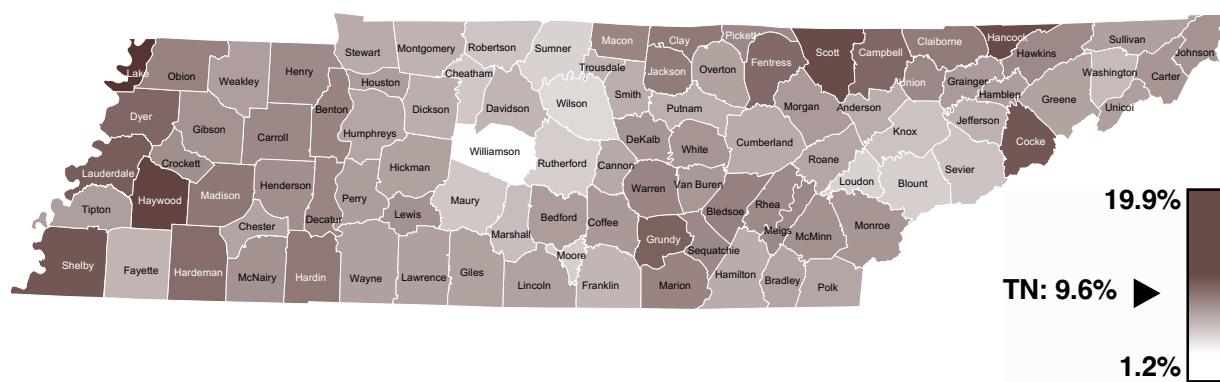


Note: USDA's most recent analysis of SNAP participation of eligible individuals is FFY 2022. FFY 2021 SNAP participation of eligible individuals was unavailable because data were incomplete due to pandemic-related federal waivers in place through most of the year.

Source: Tennessee Department of Human Services, September SNAP Enrollment Reports 2015-2022 (31); U.S. Census Bureau National Intercensal Population Total 2010-2020 (33); and U.S. Census Bureau National Population Totals 2020-2024 (34); U.S. Department of Agriculture Food and Nutrition Service Estimates of State SNAP Participation Rates 2015-2022 (37)

Figure 6. Between 1.2% and 19.9% of Tennesseans in Each County Receive SNAP

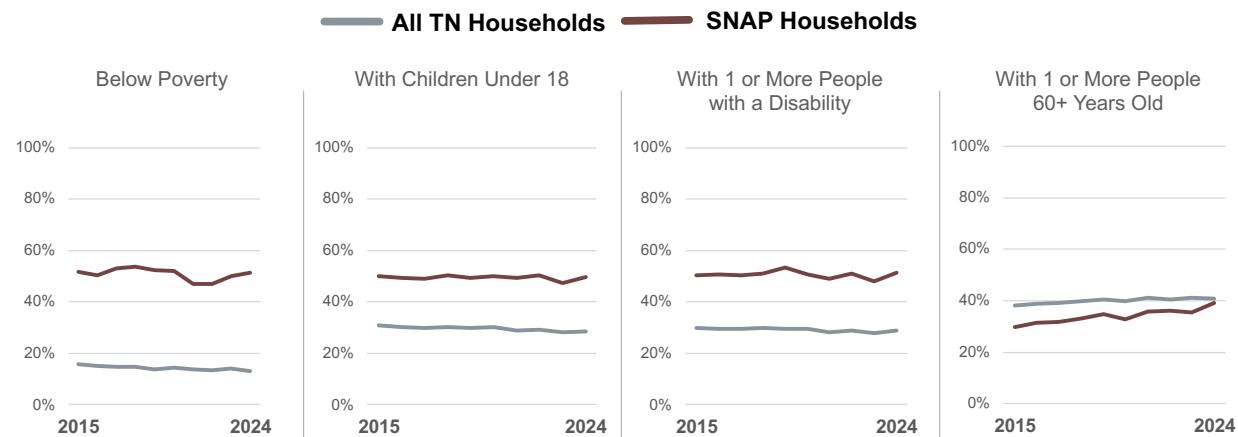
Percentage of Individuals Participating in SNAP by County (2025)



Source: Tennessee Department of Human Services, September 2025 SNAP Enrollment Report (31) and U.S. Census Bureau 2024 Annual Estimates of Resident Population for Counties (38)

Figure 7. Half of Tennessee SNAP Households Are Below Poverty, Include Children, or Have at Least One Person with a Disability

Characteristics of Tennessee SNAP Households vs. All Households (2015-2024)



Source: U.S. Census Bureau, American Community Survey 2024 1-Year Estimates (39)

Figure 8. Tennessee Households Receiving SNAP Get an Average of \$415 Each Month in Benefits

Average Monthly SNAP Benefits Per Household in Tennessee (FFY 2015-FFY 2025)



Note: Inflation adjusted numbers are in 2025 dollars using the CPI-U. Benefit amounts in 2020 and 2021 reflect temporary COVID-19-related emergency benefits.

Source: U.S. Department of Agriculture SNAP Monthly Participation and Benefit Summary Reports FFY 2015- FFY 2025 (32) Bureau of Labor Statistics, Consumer Price Index for All Urban Consumers (CPI-U), US City Average, Food and Beverages (40)

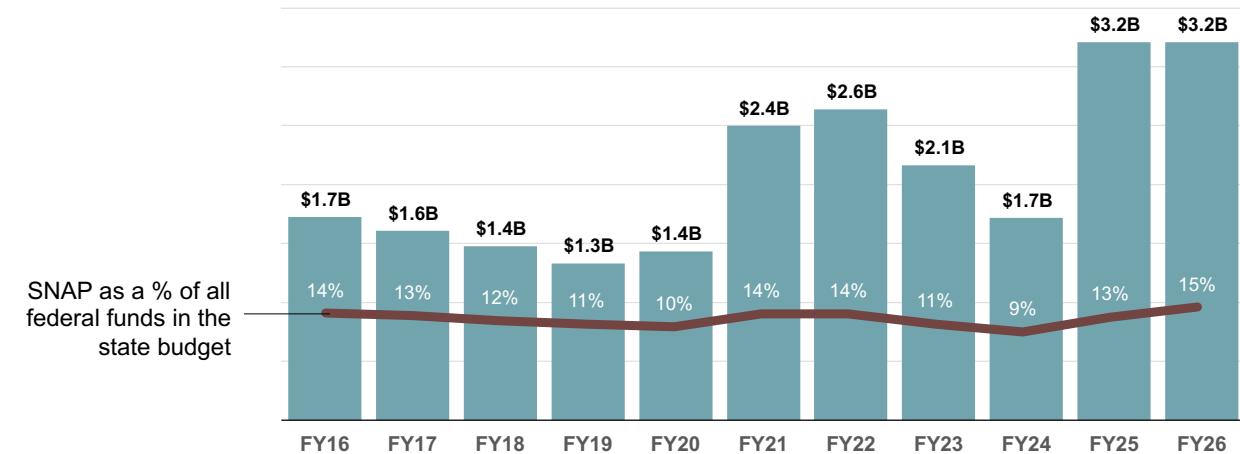
SNAP Funding

Federal SNAP funds flow through and are accounted for in state budgets. Tennessee receives between \$2 billion to \$3 billion in federal funding per year for SNAP, which amounted to about 15% of all federal revenues in the FY 2026 state budget (Figure 9).

In recent history, the federal government has also funded SNAP increases during economic downturns. Like many safety net programs, SNAP is considered counter-cyclical because demand for the program typically increases during recessions, and program benefits can be used as a tool to generate economic activity. During both the COVID-19 pandemic and the Great Recession of 2007-2009, the federal government funded temporary benefit increases and granted flexibility to states to waive certain eligibility and administrative program requirements.(35) (41) In FY 2021, for example Tennessee issued over \$700 million in emergency benefits to SNAP households.(36)

Figure 9. SNAP Funding Accounts for 15% of All Federal Revenues in Tennessee's Budget

Federal Funding for Tennessee SNAP (FY 2016-FY 2026)



Note: FY 2016 through FY 2024 SNAP funding is based on actuals noted in the state budget. FY 2025 and FY2026 amounts are based on estimated and recommended funding for the fiscal years.

Source: The Sycamore Institute's analysis of the FY 2016 to FY 2026 Tennessee State Budgets (42)

States must cover a portion of administrative costs—a share that will increase from 50% to 75% beginning October 2026. Administrative costs cover the resources needed to oversee SNAP benefits—such as staffing, technology, and state program operations. Currently, the state and federal governments split these costs evenly, but under the OBRA Act, states must cover 75% of these costs starting in federal FY 2027 (October 1, 2026). (43) In FFY 2023, Tennessee's SNAP administrative costs totaled \$256 million. (44) TDHS estimates that it would need an additional \$77 million in recurring state funds to cover the new, higher cost-share. (45)

States may also be required to cover up to 15% of the cost of SNAP benefits beginning October 2027. (43) Currently, the federal government fully funds SNAP benefits. Starting in federal FY 2028 (October 1, 2027), new matching requirements may be triggered by a state's SNAP payment error rate, which measures how accurately a state determines household eligibility and benefit amounts. Under the OBRA Act, states with a payment error rate over 6% will have to cover as much as 15% of benefits costs (Table 2).

Payment error rates include cases where households receive either more (i.e., overpayments) or fewer (i.e., underpayments) benefits than they are entitled to. Payment errors may be the result of household expense calculation errors or out-of-date income information and are often unintentional.

USDA calculates each state's payment error rate using a randomized state-level review of cases and a subsequent federal-level review. If a state's payment error rate is over 6%, it must implement a corrective action plan that identifies ways to lower the error rate. (46)

Table 2. Tennessee Could Have To Cover Up To \$243 Million In SNAP Benefits If Its Payment Error Rate Remains Above 6%

Tennessee's Potential SNAP Benefit Costs Under New Cost-Sharing Requirements

Payment Error Rate	O BBB Cost Share Percentage Requirement	Potential Tennessee Cost in FFY 2028 (assuming benefits issued are the same as FFY 2024)
<6%	0%	\$0
6-8%	5%	\$81 million
8-10%	10%	\$162 million
>10%	15%	\$243 million

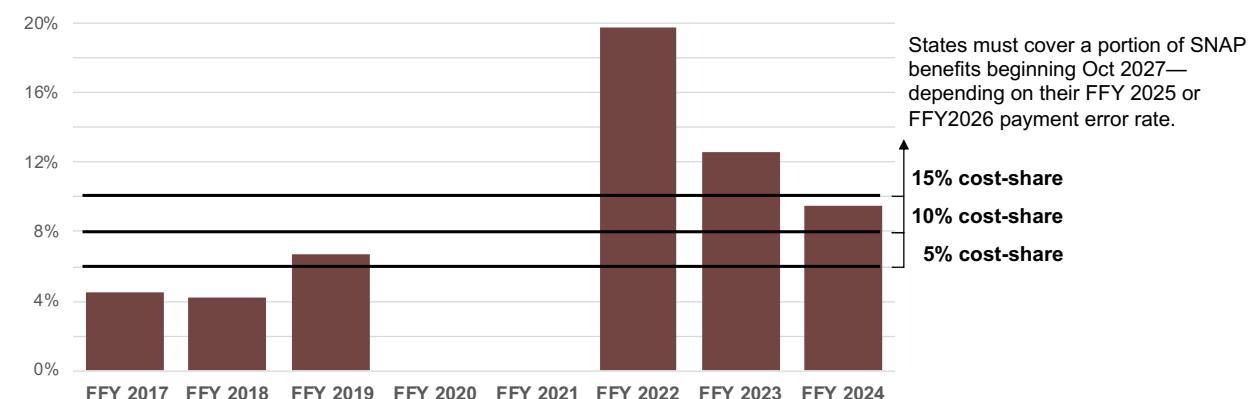
Note: The potential cost was calculated by multiplying the cost share percentage by the total amount of benefits issued to Tennesseans in FFY 2024 (October 1, 2023 through September 30, 2024). The actual cost in FFY 2028 will depend on the state's payment error rate, the total amount of SNAP benefits issued in FFY 2028, and inflationary adjustments to benefit amounts based on the Thrifty Food Plan.

Source: The Sycamore Institute's analysis of U.S. Department of Agriculture SNAP Monthly Participation and Benefit Summary Reports FFY2024 (32)

Tennessee's federal FY 2024 payment error rate of 9.5% would require the state to cover 10% of SNAP benefit costs if it remains the same (Figure 10).(47) States can choose whether to use their FFY 2025 or FFY 2026 payment error rate to determine the FFY 2028 cost-sharing requirement. Based on Tennessee's FFY 2024 SNAP benefit expenditures, Tennessee would have to contribute between \$81-243 million toward SNAP benefits if the payment error rate remains above 6%. (Table 2)

Figure 10. Tennessee's SNAP Payment Error Rates Have Declined in Recent Years But Could Trigger New State Cost-Sharing Mandates

Tennessee SNAP Payment Error Rates vs. O BBB Act Cost-Share Requirements (FFY 2017-FFY 2024)



Note: FFY 2020 and FFY 2021 payment error rates are unavailable from USDA due to incomplete data sets during the COVID-19 pandemic.

Source: USDA Food and Nutrition Service, SNAP Payment Error Rates FFY 2018- FFY 2024 (47)

Parting Words

SNAP provides food assistance to hundreds of thousands of low-income households across the state. Recent changes under the OBBB Act will alter program administration, funding responsibilities, and eligibility requirements. As these provisions take effect, Tennessee will need to monitor their impact on participation, state costs, and program accuracy to ensure effective implementation and support for residents in need.

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