



## Full Family Sanctions Threaten Vulnerable Texans: Up to 700K+ Households at Risk

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The 2025 federal budget law, H.R. 1, includes new work requirements that can lead to Full Family Sanctions (FFS) for entire households enrolled in public benefit programs like the Supplemental Nutrition Assistance Program (SNAP) and Temporary Assistance for Needy Families (TANF). An FFS restricts all household members benefits when just one member fails to meet an administrative requirement for maintaining access to program benefits.

**The Texas Health and Human Services Commission (HHSC) can rescind this policy at any time without legislative direction.** HHSC is choosing to implement FFS for SNAP recipients under the new work requirement policy even though no federal or state law is mandating the agency to do so.<sup>1</sup>

### Expanding SNAP Work Requirements

H.R. 1 increases the number of SNAP enrollees who must meet and report on work requirements. Previously, HHSC did not require households with children under 19, veterans, people experiencing homelessness, seniors over 55, refugees, or asylees to meet the work requirements that adults without dependents had to meet to keep SNAP benefits.

Now, households with children between 14–18, veterans, people experiencing homelessness, and seniors 55–64 must all meet and report on work requirements in order to remain eligible for SNAP. If they fail to meet and report on those requirements, HHSC can sanction everyone on their SNAP applications, including children.

#### *How Full Family Sanctions Work:*

- Those who are subject to SNAP work requirements must work, attend approved job training, or volunteer for at least 80 hours per month.
- If any member in the household whom H.R. 1 requires to work drops below the 80-hour threshold, quits their job, or is fired, the Texas Workforce Commission (TWC) notifies HHSC of a program violation (A-136.4). HHSC will then send a Failure to Comply<sup>2</sup> letter to the household.

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<sup>1</sup> "A-1840, Noncooperation with ESP, Texas Works Handbook, Texas Health and Human Services Commission, February 9, 2026, <https://www.hhs.texas.gov/handbooks/texas-works-handbook/a-1840-noncooperation-esp>.

<sup>2</sup> "A-1860 Determining Good Cause (Form H-1818)," Texas Health and Human Services Commission, February 9, 2026, <https://www.hhs.texas.gov/handbooks/texas-works-handbook/a-1860-determining-good-cause>.



- Households have ten days to respond with sufficient evidence of a “good cause” for not meeting the work requirement. If they cannot, HHSC sanctions the entire household. These paper or digital letter exchanges between enrolled recipients and HHSC are burdensome, and many lose SNAP because they missed paperwork, *not* because they failed to meet program requirements.
- HHSC can sanction the entire family for up to six months, depending on how many instances (months) of non-compliance they commit.

Because the sanction applies to the head of household who cannot meet their work requirements **and the entire household**, kids and teens as well as, seniors, veterans, homeless people, and people with disabilities can all lose benefits. Under FFS, vulnerable populations may go without SNAP support because of confusing paperwork and timelines, unclear direction, or emergency situations that prevent enrolled families from filing paperwork.

### Bad Policy Impacts Vulnerable Texans

H.R. 1 added millions to the group of SNAP enrollees who must meet and report on work requirements. As a result, FFS could impact up to 700,000 Texas households. These households have a head of household who is: 16–60 years old, not in school at least half time, not exempt from work requirements, does not have a child under 14 in the home, and is not pregnant. They may care for aging parents, a person with a disability, or have children 14 or older in the home.

### Moving Forward: Rescind Optional FFS Policy & Improve “Good Cause” Exemption Process

If heads of household cannot work or are unable to adequately report their hours, then HHSC should sanction only those members required to work. A fourteen-year-old child needs adequate nutrition, as do seniors and people with disabilities. Since many states don’t operate under the FFS policy, federal lawmakers did not take FFS into consideration when revising SNAP eligibility rules during H.R. 1 deliberations. **People who are exempt from work in a household should be exempt from work non-compliance sanctions.**

All SNAP enrollees who are eligible for “good cause”<sup>3</sup> exemptions should understand and submit paperwork to HHSC to prove their qualified reasons for exemption from work requirements and to protect their household members from FFS. SNAP applicants with an ongoing good cause exemption, including not having transportation for getting to or from work, being a survivor of family violence, or other causes, should include evidence of those exemptions in their initial SNAP

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<sup>3</sup> “A-1820, Employment Services Programs Procedures,” Texas Health and Human Services Commission, February 9, 2026, <https://www.hhs.texas.gov/handbooks/texas-works-handbook/a-1820-employment-services-programs-procedures>.



applications.<sup>4</sup> However, providing good cause exemption details is not currently part of the SNAP application process, and HHSC has not outlined all acceptable evidence that the agency may consider to exempt households.

Lawmakers should contact HHSC directly and/or work with House Human Services Committee members and Senate Health & Human Services Committee members to direct HHSC to rescind FFS.

Stakeholders can support legislative offices advocating HHSC to remove this harmful policy by emailing [lonestar@hhs.texas.gov](mailto:lonestar@hhs.texas.gov) or by filing a complaint with HHSC's Ombudsman's office at [heartbep-ext.hhs.state.tx.us/omdLandingPage](http://heartbep-ext.hhs.state.tx.us/omdLandingPage).

### Additional Resources

- **House Committee on Human Services**  
[house.texas.gov/committees/committee/310](http://house.texas.gov/committees/committee/310)
- **Senate Committee on Human Services**  
[senate.texas.gov/cmte.php?c=610](http://senate.texas.gov/cmte.php?c=610)
- **Texas Works Handbook (A-2140, Full-Family Sanction)**  
[hhs.texas.gov/handbooks/texas-works-handbook/a-2140-full-family-sanction](http://hhs.texas.gov/handbooks/texas-works-handbook/a-2140-full-family-sanction)
- **Texas Works Handbook (A-1810, General Policy)**  
[hhs.texas.gov/handbooks/texas-works-handbook/a-1810-general-policy](http://hhs.texas.gov/handbooks/texas-works-handbook/a-1810-general-policy)
- **1 Tex. Admin. Code § 372.1352 (Legal Information Institute)**  
[law.cornell.edu/regulations/texas/1-Tex-Admin-Code-SS-372-1352](http://law.cornell.edu/regulations/texas/1-Tex-Admin-Code-SS-372-1352)
- **HHSC SNAP Reports**  
[hhs.texas.gov/about/records-statistics/data-statistics/supplemental-nutritional-assistance-program-snap-statistics](http://hhs.texas.gov/about/records-statistics/data-statistics/supplemental-nutritional-assistance-program-snap-statistics)
- **Texas Works Handbook**  
[hhs.texas.gov/handbooks/texas-works-handbook](http://hhs.texas.gov/handbooks/texas-works-handbook)
- **Noncooperation policy**  
[hhs.texas.gov/handbooks/texas-works-handbook/a-1840-noncooperation-esp](http://hhs.texas.gov/handbooks/texas-works-handbook/a-1840-noncooperation-esp)

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<sup>4</sup> "A-1860, Determining Good Cause," *Texas Works Handbook*, Texas Health and Human Services Commission, February 9, 2026, <https://www.hhs.texas.gov/handbooks/texas-works-handbook/a-1860-determining-good-cause>.

