

October 27, 2025

Contact:

Press@legal-aid.org

*****FOR IMMEDIATE RELEASE*****

Legal Aid Files Lawsuit Against USDA for Premature, Unlawful Termination of Work Requirement Waiver for New York City SNAP Recipients

If Waiver is Terminated Early, 100,000 Low-Income New Yorkers Risk Losing Critical Food Benefits

City of New York Submits Declaration in Support of Lawsuit

(NEW YORK, NY) – The Legal Aid Society today [filed](#) a class action [lawsuit](#) in the United States District Court for the Southern District of New York against the United States Department of Agriculture (USDA) for their premature and unlawful termination of a waiver that has long shielded New Yorkers who receive Supplemental Nutrition Assistance Program (SNAP) benefits from additional work requirements. In addition to the plaintiff class, the Urban Justice Center – Safety Net Project also challenges USDA’s action, alleging harm to the organization and its clients and members. The Commissioner of the New York City Department of Social Services (DSS) Molly Park also submitted a [declaration](#) in support of the lawsuit, attesting to the immense administrative burdens placed on DSS by USDA’s action.

As a result of USDA’s action, approximately 100,000 New York City SNAP recipients who are classified as “Able Bodied Adults Without Dependents” (ABAWDs) will have one month to seek exemptions, or else find employment or begin participation in approved work programs starting December 1, 2025, or risk losing critical food benefits on which they rely to feed themselves and their families.

The ABAWD waiver had previously been approved by USDA to run through February 28, 2026, and was based on a “lack of sufficient jobs” in 61 New York State counties, including the five boroughs of New York City.

Now, due to the termination on November 2, New York City SNAP recipients classified ABAWDs will have just 30 days to come into compliance with onerous work requirements, including that they must document 80 hours of qualifying work or work-related activity every month. Those who cannot satisfy the ABAWD work requirements starting on December 1 will begin to accrue “countable months” of noncompliance and will lose SNAP benefits once they reach three countable months of noncompliance. With the early termination of the waiver, SNAP recipients who are unable to meet the ABAWD work requirement will lose their SNAP benefits as early as March 1, 2026.

Moreover, USDA’s directive severely limits the amount of time the NYC Human Resources Administration (HRA) – the agency tasked with administering the SNAP program in New York City – has to complete the myriad procedures necessary to implement and track the work requirements. The accelerated timeline for giving

notice to recipients, screening for possible exemptions such as disability or pregnancy, and providing recipients with employment referrals will undoubtedly lead to administrative chaos and errors.

The class action lawsuit seeks to block USDA from prematurely terminating the ABAWD waiver.

“Roughly 100,000 low-income New Yorkers who rely on SNAP benefits to put food on the table for themselves and their families will be impacted,” said **Laboni Rahman, staff attorney in the Civil Law Reform Unit at The Legal Aid Society**. “Terminating the ABAWD waiver months before it was set to expire is not only unlawful, but unnecessarily cruel during a time of historic unaffordability in New York City. The rushed implementation of the ABAWD work requirement will undoubtedly lead to confusion and administrative chaos, resulting in more New Yorkers losing subsistence-level benefits that may be the only thing standing between them and food insecurity. USDA’s unlawful action must not be allowed to stand, and no New Yorker should go hungry because of a thoughtless decision made without regard for the people it impacts.”

“The USDA has set up an impossible deadline for implementation of draconian new ABAWD work requirements. Millions of people nationwide will lose their SNAP benefits, exactly as the Trump administration intends. This rushed and cruel timeline shows, yet again, that SNAP work requirements were never about work or opportunity. They were always about cutting off food assistance from low-income working people,” said **Helen Strom, Benefits and Homeless Advocacy Unit Director at the Safety Net Project at the Urban Justice Center**. “People receiving SNAP in NYC already face hours-long waits on understaffed phone lines and at SNAP offices just to maintain their benefits. The tens of thousands of people contacting the City about the new work requirements will only exacerbate these issues, and many will not be able to get through at all. Combined with the Trump administration’s refusal to fund November SNAP benefits, we are facing a true hunger crisis in New York City, with 1.8 million people at risk of losing their November benefits and tens of thousands at risk of losing their benefits indefinitely due to ABAWD cuts.”

Background on Organizational Plaintiff

Urban Justice Center-Safety Net Project, an independent project of the Urban Justice Center, is a nonprofit organization that provides free legal services to low- and no-income households at legal clinics located at food pantries, soup kitchens, and community health centers throughout New York City. They advise, assist, and represent New York City’s most vulnerable members who have questions about, or issues with, public benefits programs, including Public Assistance, SNAP, and Medicaid, as well as provide a range of housing and homelessness legal services.

SNP additionally conducts policy work in coordination and partnership with the Safety Net Activists, a volunteer group of community members with personal experience with poverty, homelessness, and the public benefits system. In the past decade, SNP worked on over 5,600 cases where they assisted individuals with their Public Assistance and SNAP cases.

###

The Legal Aid Society is a nonprofit organization that exists for one simple yet powerful reason: to ensure that New Yorkers are not denied their right to equal justice because of poverty. For nearly 150 years, we have protected, defended, and advocated for those who have struggled in silence for far too long. Every day, in every borough, The Legal Aid Society changes the lives of our clients and helps improve our communities.

www.legalaidnyc.org