

FAMILY INVESTMENT ADMINISTRATION

Policy Number:	27-05
Policy Title:	Updates to SNAP Manual Section 106: ABAWD (Time Limited Participation)
Release Date:	October 6, 2026
Effective Date:	July 1, 2026
Approved By:	Augustin Ntabaganyimana Executive Director Family Investment Administration
Revision Date(s):	Not applicable.
Supersedes:	Not applicable.
Originating Office:	Office of Programs Office of Nutrition Assistance Programs (ONAP)
Required Actions:	Review SNAP Manual Section 106 ABAWD (Time Limited Participation)
Key Words:	Able-Bodied Adults Without Dependents, ABAWD, Time Limited Participation, SNAP Work Requirements, Work Registration, exception, exemption, discretionary exemption, documentation, verification, countable month
Related Federal Law	Pub. L. No. 119-21 § 10102 ; 7 U.S.C. § 2015(o) ; 7 CFR § 273.24 ; 7 CFR § 273.7
Related State Laws	Not applicable.
COMAR	COMAR 07.03.17.23 ; 07.03.17.21
State Plan Implications?	Yes.

 Maryland Department of Human Services Department of Human Services 25 S Charles Street Baltimore MD 21201	FAMILY INVESTMENT ADMINISTRATION (FIA) INFORMATION MEMO
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**TO: LOCAL DEPARTMENTS OF SOCIAL SERVICES (LDSS)
DIRECTORS, LDSS DEPUTY/ASSISTANT DIRECTORS FOR
FAMILY INVESTMENT, FAMILY INVESTMENT SUPERVISORS,
AND ELIGIBILITY STAFF**

FROM: AUGUSTIN NTABAGANYIMANA, EXECUTIVE DIRECTOR



**RE: UPDATES TO SNAP MANUAL SECTION 106: ABAWD (TIME
LIMITED PARTICIPATION)**

**PROGRAM AFFECTED: SUPPLEMENTAL NUTRITION ASSISTANCE
PROGRAM (SNAP)**

ORIGINATING OFFICE: OFFICE OF PROGRAMS

Summary

FIA has updated Maryland SNAP Manual Section 106, which provides policy information related to Able-Bodied Adults Without Dependents (ABAWD). There are three major policy changes:

1. The 36-month clock for the ABAWD three-month time limit reset on July 1, 2026. The new clock runs from July 1, 2026, through June 30, 2029, at which time the clock will reset again.
2. Information has been added detailing how individuals experiencing chronic homelessness meet the exception for "is obviously mentally or physically unfit for employment as determined by the State agency."
3. Updated definitions for Indian, California Indian, and Urban Indian to better align with federal statutes and regulations.

This IM also provides a table clarifying which exemptions and exceptions to ABAWD work requirements are system-automated and examples of acceptable documentation when manual verification is needed.

Definitions

Able-Bodied Adults Without Dependents (ABAWD): An individual 18-64 years of age who is able to work and is not residing in a SNAP household containing a dependent child under age 14 for whom the individual is responsible. ABAWDs are subject to a 3-month time limit unless they meet certain work requirements or exemptions/exceptions, detailed below.

Exceptions: Reasons for which an ABAWD is not subject to the 3-month ABAWD time limit. See FIA Action Transmittal (AT) [26-09: H.R. 1 \(2025\) Modifications to SNAP Work Requirements for ABAWDs](#) for details on how H.R. 1 (2025) changed ABAWD exceptions.

Exemptions: Reasons individuals are not subject to work registration requirements and/or the three-month ABAWD time limit. *Statutory exemptions* are established in federal statute and apply to both work registration and ABAWD requirements. *Individual exemptions* are additional exemptions identified and defined by the state and only apply to work registration requirements.

Work Registration: Individuals who do not meet an exemption from general work requirements must register for work. This means that they must accept any offer for suitable employment and may not voluntarily quit or reduce their work hours below thirty (30) per week without good cause.

Policy

According to [7 CFR 273.24](#), individuals meeting the definition of ABAWD may not participate in SNAP if they have received SNAP benefits for three countable months during a set three-year (36-month) period, except under certain circumstances. The circumstances are detailed in SNAP Manual Section 106. During these three-year spans, an individual who meets the ABAWD definition is only eligible for three countable months of SNAP benefits **unless they are in compliance with or exempt from work requirements**. Countable months do not have to be consecutive.

The current 36-month period began July 1, 2026, and continues through June 30, 2029. A new 36-month period will begin on July 1, 2029.

Countable months are months where an individual receives SNAP benefits for the full month while not:

1. Exempt from work activity due to one (1) of the exemptions/exceptions listed in section 106.4;
2. Covered by a waiver awarded by the Food and Nutrition Administration;

3. Fulfilling the work requirements detailed in section 106.6;
4. Receiving prorated benefits for a part of a month; or
5. In the month of notification from a SNAP Employment and Training (SNAP E&T) provider determining non-compliance or unsuitability of the individual.

ABAWD Work Requirements

Unless they meet the criteria for an exemption, ABAWD-designated customers must work or engage in acceptable work activities for at least **20 hours per week or an average of 80 hours per month.**

Acceptable work activities include paid employment or self-employment (as explained below), in-kind work (receiving goods or services for work), unpaid work, volunteer work, or a combination of these. Any hours claimed for paid employment or self-employment must meet the minimum income requirements stipulated by the [Fair Labor Standards Act \(FLSA\)](#), where hourly earnings are at least the federal minimum wage.

Exempting Individuals Experiencing Chronic Homelessness

The exemption for physically or mentally unfit detailed in Section 106.4C has been updated to include experiencing chronic homelessness. A person experiencing chronic homelessness is an individual who lacks a fixed and regular nighttime residence, including locations such as a homeless or domestic violence shelter; outdoor or makeshift locations; vehicles; RV-type structures without active utilities or sewer or septic hookups; or other places not designed for, or ordinarily used as, regular sleeping accommodations for human beings. This includes environments without access to toilets or where basic hygiene or stable sleep cannot be maintained. **When the individual's chronic homelessness creates barriers that prevent working 20 hours per week, they are determined to be an individual obviously physically or mentally unfit for employment for purposes of the ABAWD exemption based on the eligibility worker's discretion.** Effective when the eligibility worker becomes aware that the applicant or recipient is experiencing chronic homelessness. (Ensure full details of the customer's situation are narrated in the Eligibility & Enrollment data system (E&E).)

Updated Definitions for Indian, California Indian, and Urban Indian

FIA revised the definitions for Indian (106.4G), California Indian (106.4H), and Urban Indian (106.4I) to better align with federal law and regulations. The revisions have broadened these definitions, potentially increasing access to these exemptions from the three-month ABAWD time limit.

Exemption/Exception Verification

To reduce payment error rates, case managers must verify exemptions and exceptions to ABAWD work requirements **where needed**. Most exemptions require manual verification. Some verifications are system-automated when coded correctly in E&E and only need additional verification in specific circumstances, as indicated in the table below.

Collateral contact with reliable sources are considered acceptable verification for all exemptions and exceptions when all of the following are documented in narration:

- A. Contact name;
- B. Contact title or justification of their ability to provide the information needed;
- C. Contact information; and
- D. Information that they are verifying.

Examples of acceptable verifications for each exemption or exception include (but are not limited to):

Exemption/Exception	Examples of Acceptable Verification	E&E Coding
Under 18 or 65 years of age or older	System automated. Only request from the customer if questionable. Examples: Birth certificate, Photo ID	System verifies independently via Date of Birth
Employed or Self-Employed (Minimum 30 hours/week OR earning a weekly equivalent of the Federal minimum wage × 30)	System automated via The Work Number. If unavailable, the customer provides: Pay stubs Employer statements Self-employment records	Income Screen (Earned Income Tab): Verify and record the exact hours and income.
Unemployment Compensation (UC) (Receiving or has applied)	System automated via BEACON (MD unemployment). If questionable or out-of-state: UC award letter or benefit check Documentation of UC application	Receiving: Verify income on Unearned Income Tab. Applied: Case manager selects the appropriate option on the ABAWD Screen.

Exemption/Exception	Examples of Acceptable Verification	E&E Coding
Care of a Dependent Child under Age 14 (Parent or household member)	System automated. Only request from the customer if questionable. Examples: Birth certificate, Photo ID.	Verified via Relationship and Program Request screens.
Care of an Incapacitated Person (Parent or household member responsible for care)	Statement from a medical professional. Completed medical form (e.g., 500 Form) for the incapacitated individual.	Ensure documentation is uploaded, and relevant household screens reflect caretaking status.
Physically or mentally unfit for employment (Includes Supplemental Security Income (SSI), Social Security Disability Insurance (SSDI), Temporary Disability Assistance Program (TDAP), Workers' Comp, or temporary/permanent conditions preventing 20+ hours of work/week due to illness, mental health, substance abuse, domestic violence, or experiencing chronic homelessness)	Statement from a doctor or a completed 500 Medical Form (verify license # via MD Board of Practitioners/Nurses if missing). Approved Workers' Comp claim/award . SSI/SSDI approval letter.	Unearned Income Screen: Record disability-related income. Health and Disability Screen: Enter the disability details.
Pregnancy	Letter on letterhead from a licensed medical professional. Completed 500-A Medical Form . Doctor visit record.	Pregnancy screen: Record details directly on the Pregnancy Screen.
Student (Enrolled at least half-time)	School registration document. Official statement or letter from the school.	Complete the Educational Details Screen.

Exemption/Exception	Examples of Acceptable Verification	E&E Coding
Drug/Alcohol Treatment Participant (Regular participant in a rehab/treatment program)	Statement or enrollment letter from the treatment facility (must be on official letterhead).	Impatient: Update Living Arrangements on Individual Details Screen . Outpatient: Select the option on the ABAWD Screen .
Indian, California Indian, Urban Indian, Alaska Native, or other Tribal Identity (As defined by the Indian Health Care Improvement Act)	If required: Tribal identification card. Official Tribal documentation.	The case manager selects the corresponding option on the ABAWD Screen .
Subject to/Complying with Title IV Work Requirements (e.g., TANF/TCA)	Documentation submitted to TCA is sufficient; no additional action needed for SNAP case.	E&E System: Active or pending TCA. Verified via Program Eligibility (per member) and the Non-Compliance Screen .

Eligibility and Enrollment (E&E) System Updates

- A. All ABAWD counters reset to zero (0) on July 1, 2026.
- B. SNAP customers who exhausted their third ABAWD month in June 2026 did not have their case closed for non-compliance (reason code 526) on June 30, 2026. Instead, their benefits remained active, and their ABAWD counter was reset to zero for July 2026. July 2026 is now the first month of the new cycle.
- C. Customers meeting the ABAWD definition and who are not members on an active SNAP case because they exhausted their 3 months under the previous clock were **not** automatically added back to the SNAP case as a member. The household must report an interim change, or the individual must apply for SNAP, and an ABAWD screening must be completed.
- D. Any SNAP applicant applying on or after July 1, 2026, who meets the ABAWD definition will be able to receive three countable months of benefits, regardless of any countable months used prior to July 1, 2026, or any case closure for noncompliance with work requirements prior to July 1, 2026.

References

[SNAP Manual Section 106 ABAWDS \(Time-Limited Participation\)](#)

[FIA Action Transmittal 26-09: H.R. 1 \(2025\) Modifications to SNAP Work Requirements for ABAWDs](#)

Inquiries

Please direct policy questions to FIA Policy by completing the [FIA Policy Information Request Form](#). Montgomery County staff may submit their policy questions via email at fia.policy@maryland.gov.

cc: DHS Executive Staff
 Constituent Experience
 DHS Help Desk
 FIA Management Staff
 Office of Administrative Hearings