FAMILY INVESTMENT ADMINISTRATION

Policy Number:	AT 26-09	
Policy Title:	H.R. 1 (2025)-Modifications to Supplemental Nutrition Assistance Program (SNAP) Work Requirements for ABAWDs	
Release Date:	October 16, 2025	
Effective Date:	November 1, 2025	
Approved By:	Augustin Ntabaganyimana Executive Director Family Investment Administration	
Revision Date(s):	Not applicable.	
Supersedes:	AT 24-17 ABAWD 3 Month Time-Limits, New 36-Month Period, Waived Jurisdictions and Fiscal Responsibility Act 2023; AT 21-11 ABAWD Waiver Extension and Referral Guidance	
Originating Office:	Office of Programs Office of Nutrition Assistance Programs (ONAP)	
Required Actions:	Update SNAP cases to reflect the new ABAWD exception policies stipulated in the H.R. 1 of 2025.	
Key Words:	Able-Bodied Adults Without Dependents, ABAWD, SNAP Work Requirements, Work Registration, exception, exemption, discretionary exemption	
Related Federal Law	Pub. L. No. 119-21 § 10102; 7 U.S.C. § 2015(o); 7 CFR § 243.24; 7 CFR § 273.7	
Related State Laws	Not applicable.	
COMAR	COMAR <u>07.03.17.23</u> ; <u>07.03.17.21</u>	
State Plan Implications?	No.	



Department of Human Services 25 S Charles Street Baltimore MD 21201

FAMILY INVESTMENT ADMINISTRATION (FIA) ACTION TRANSMITTAL

Control Number: #26-09

Effective Date: November 1, 2025

Issuance Date: October 16, 2025

TO: LOCAL DEPARTMENTS OF SOCIAL SERVICES (LDSS)

DIRECTORS, LDSS DEPUTY/ASSISTANT DIRECTORS FOR

FAMILY INVESTMENT, FAMILY INVESTMENT SUPERVISORS AND 'sugnestion

ELIGIBILITY STAFF

AUGUSTIN NTABAGANYIMANA, EXECUTIVE DIRECTOR FROM:

RE: **HOUSE RESOLUTION 1 of 2025 (H.R. 1 2025)-MODIFICATIONS TO**

SNAP WORK REQUIREMENTS FOR ABLE-BODIED ADULTS

WITHOUT DEPENDENTS (ABAWDS)

PROGRAM AFFECTED: SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM (SNAP)

ORIGINATING OFFICE: OFFICE OF PROGRAMS

Summary

On July 4, 2025, President Donald J. Trump signed into law H.R. 1 (2025). Section 10102 of H.R. 1 (2025) modifies Section 6(o) of the Food and Nutrition Act by changing which individuals are subject to the Able-Bodied Without Dependents (ABAWD) work requirements.

Definitions

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

California Indian: Any individual who is:

- a. A member of a federally recognized California Indian tribe,
- A descendant of an Indian who was residing in California on June 1, 1852, if the descendant is either part of a local Indian community program or is considered an Indian by their community,
- c. An Indian who holds trust interests in public land, national forest land, or reservation allotments in California, or
- d. Listed for asset distribution from California reservations under the Act of August 18, 1958, or if they are a descendant of someone on that list.

Disabled: Individuals who are not able to participate in work activity because of a physical or mental barrier. For Work Registration purposes, the disability must be verified by a licensed provider, or the individual must receive a type of disability income. An ABAWD may be considered disabled and require no additional verification if their disability is obvious to the eligibility worker.

Exceptions: Reasons for an ABAWD is not subject to the 3-month ABAWD time limit.

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 may 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.

Good Cause: Reasons beyond an individual's control that prevent their

compliance with work requirements.

Indian: Any individual who is:

- a. A member (or whose parents or grandparents were) of an Indian tribe, even if they are not currently recognized by the federal government right now or if they were terminated,
- b. An Alaska Native (including Eskimos, Aleuts, or other Alaska Natives),
- c. Considered an Indian by the Secretary of the Interior, or
- d. Determined to be an Indian under regulations by the Secretary of the Interior.

Urban Indian: Any individual who is an Indian (as defined above) **AND** is living in any community that the Secretary of the Interior determines has enough of an urban Indian population with unmet health needs to warrant assistance.

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

Work Registration

According to <u>7 CFR 273.7(b)(1)</u>, SNAP participants are **statutorily exempt** from Work Registration if they meet any of the following:

- A. Under age 16 or age 60 or older.
- B. Have a physical or mental barrier to work.
- C. Enrolled in training or school at least half-time.
 - a. Students enrolled at least half-time in an institution of higher education (as defined by the institution) must meet the student eligibility requirements.
- D. Responsible for the care of a child under age 6 or a person who needs

help caring for themselves (incapacitated individual).

- E. Applied for or are receiving unemployment benefits.
- F. Meeting work rules for Temporary Cash Assistance (TCA);
- G. Working 30 hours or more per week **or** earning at least Federal Minimum Wage times 30 hours (\$217.50 per week or \$435 per bi-weekly pay); or,
- H. Participating in a drug or alcohol treatment and rehabilitation program.

According to <u>SNAP Manual section 130.6(D)</u>, SNAP participants may be **individually exempt** from Work Registration (not ABAWD) if they are unable to comply due to the following:

- A. Older individual Aged 55 or older with no formal skill training and has not been employed within the last 10 years and has less than a 10th grade education.
- B. Multiple barriers There are multiple barriers to employment, including but not limited to, alcohol or drug abuse or lack of a driver's license (making transportation to the work program site difficult).
- C. Childcare difficulties Caretaker relatives of a child aged 12 years or under and cannot arrange adequate childcare.
- D. Family problems Experiencing domestic abuse and must attend counseling sessions that conflict with employment and training participation.
- E. Homelessness Lacking adequate shelter or a permanent home and has one or more other limitations, such as but not limited to, a history of alcohol or drug abuse, lack of transportation, or inadequate clothing.
- F. Temporary illness or disability Resulting in the inability to work for at least 90 days.
- G. Job-related The registrant has been laid off temporarily with the expectation of returning to the same employer within three months or less or a registrant who has a verifiable offer of employment to begin within 90 days.

- H. Transitional living arrangement Living in a temporary arrangement such as a shelter for battered women or other temporary housing during a family emergency.
- I. Migrant or seasonal worker The registrant who moves from one region to another to work or seek work in agriculture or a related seasonal industry, or a registrant who is under contract or has a similar agreement with an employer to begin work within 30 days.
- J. Convicted offender Performing unpaid work for a minimum of 30 hours weekly in lieu of sentencing.

K. Pregnancy

L. Transportation difficulties – No access to any mode of transportation or lives too far away (i.e. a round trip to and from the SNAP E&T program site or potential employer exceeds two hours by reasonable public or private transportation).

Eligibility workers are tasked with assessing a work registrant's inability to participate in work activities when the reason does not qualify for an exemption.

- A. When an exempt customer indicates a desire to participate in the SNAP Employment and Training (SNAP E&T) program voluntarily, the eligibility worker must provide a referral.
- B. Eligibility workers, other identified Local Department of Social Services (LDSS) staff, and/or SNAP E&T vendors must accurately document work activities in the WORKS system.

Able-Bodied Adults Without Dependents (ABAWD)

According to <u>7 CFR 273.24(b)</u>, ABAWDs are limited to three (3) months (consecutive or otherwise) of SNAP benefits within a 36-month period without being compliant with work activity. To be considered compliant with work activity, the ABAWD 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 <u>Fair Labor Standards Act (FLSA)</u>, where hourly earnings are at least the federal minimum wage.

ABAWD Exemptions

Eligibility may be extended if the ABAWD qualifies for one or more of the following exceptions:

- A. Enrolled in training or school at least half-time;
 - a. Students enrolled at least half-time in an institution of higher education (as defined by the institution) must meet the student eligibility requirements outlined in <u>SNAP Manual Section 102</u> <u>Students.</u>
- B. Applied for or are receiving unemployment benefits.
- C. Meeting work rules for Temporary Cash Assistance (TCA).
- D. Participating in a drug or alcohol treatment and rehabilitation program; or,
- E. Working 30 hours or more per week **or** earning at least Federal Minimum Wage times 30 hours (\$217.50 per week or \$435 per bi-weekly pay).
 - a. Working 30 hours per week or more (or earning at least the equivalent of that times the federal minimum wage) means that the individual is also **exempt** from the ABAWD work participation requirement.
 - b. For an ABAWD who is not working enough to meet this exemption from the ABAWD work participation requirement, 20 hours of work activity per week is required in order to be considered **compliant**.

ABAWD Exceptions

SNAP eligibility may be extended if the ABAWD qualifies for one or more exceptions to the ABAWD work participation requirements. Existing exceptions that remain unchanged as a result of H.R. 1 (2025) are:

A. Pregnancy

B. Experiencing physical or mental barriers to work.

H.R.1 of 2025 changes some ABAWD exceptions, **effective for SNAP** applications processed on or after November 1, 2025, and redeterminations beginning November 2025:

Old Policy	New Policy as of November 1, 2025	
Homelessness was an exception.	No longer valid exceptions from ABAWD work requirements.	
Veteran status was an exception.		
Aged 24 and younger who have aged out of foster care was an exception.	Workinganements	
Parents or other members of households containing a child under age 18 were exempt.	Parents or other members of households that contain a child age 13 or younger are exempt from ABAWD work requirements. Individuals in SNAP households that do not contain a child age 13 or younger are not exempt from ABAWD work requirements.	
Individuals aged 55 and older were not considered ABAWD.	Individuals aged 65 or older are not considered ABAWD.	
None.	New ABAWD exceptions for individuals who are Indian , Urban Indian , and California Indian .	

Discretionary Exemptions

Each year, the Food and Nutrition Service (FNS) awards states an allotment of Discretionary Exemptions to allow some ABAWDs to continue to receive SNAP even if they are not meeting the work requirement. A Discretionary

Exemption is counted for each month used by each ABAWD individual. They are exclusively applicable to ABAWDs who do not qualify for any other exemption or exception as outlined in the ABAWD policy.

Currently, no Discretionary Exemptions are being applied due to uncertainty of the number available for the 2026 Federal Fiscal Year (FFY) that began on October 1, 2025. We will provide updates when FNS provides clarity on the number of exemptions available to Maryland.

Good Cause

Customers who would have met the ABAWD work requirement but missed some hours for a good reason may be eligible for good cause. To be considered good cause, the absence or inability to comply with the work requirement must be temporary. If good cause is granted, the month is not considered a countable month. If good cause is granted, the eligibility worker must support the decision with applicable verification and describe the situation in the narration.

ABAWDs are not eligible for good cause when they do not meet the hours requirements due to lack of an appropriate and available opening in a SNAP E&T program. This is because there are options other than SNAP E&T to fulfill the ABAWD work requirement.

Eligibility and Enrollment (E&E) System Updates

E&E has been updated to apply the new exception rules to applications and redeterminations beginning November 1, 2025. The new ABAWD exceptions (Indian, Urban Indian, and California Indian) will be options that the eligibility worker must select on the ABAWD screen.

The Works Exemption screen is renamed the **Work Exemption/WORKS Referral** screen. Work Registration exemptions must be captured for each SNAP applicant/recipient on this screen. The new WORKS Referral section of the screen is to identify referrals made to a SNAP E&T vendor.

The **Program Eligibility** screen is updated to more clearly identify Work Registration and ABAWD status.

Required Action

The eligibility worker must:

- Screen all SNAP customers to determine if they are required to register for work or are an ABAWD or if they meet any exemptions or exceptions from the work requirements,
- 2. Update the work requirement screens in E&E (Work Exemption and ABAWD screens),
- 3. Enter all case information in the appropriate E&E screens,
- 4. NARRATE all relevant information (specific diagnoses or medical information may not be included in narration), and
- 5. Upload any exemption/exception-related documents (i.e., medical 500 form, pay stubs) to Case Documents.

Screening

E&E will continue to complete Work Registration and ABAWD screenings for each individual at each SNAP application or redetermination. Eligibility workers use the <u>ABAWD screening tool</u> form. This may be done by mailing the form to the customer at application or redetermination (we are working toward including it in the Maryland Benefit Review and redetermination mailings). Alternatively, if the customer does not complete the form, verbally complete the form during the eligibility interview. Completed ABAWD screening tool forms must be scanned or uploaded to Case Documents.

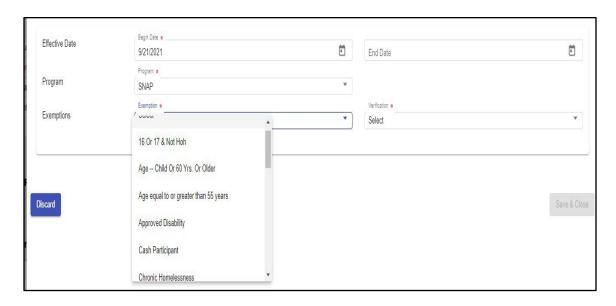
E&E is programmed to read case information and automatically give some Work Registration and ABAWD exemptions/exceptions and/or evaluate compliance with work requirements. It is imperative that all information is entered into E&E so that the automatic evaluation is applied correctly. If an individual qualifies for more than one exemption or exception, E&E will apply to the one that will be in effect the longest. The following exemptions are system-identified based on the information entered in the case:

Exemption/Exception	How E&E identifies the Exemption/Exception
Age	Date of birth

Physical or mental barriers	 Receipt of disability related income (on the Unearned Income tab of the Income screen) and/or, The disability is entered on the Health and Disability screen
Enrollment in training or school	The Educational Details screen
Responsibility for the care of a child (under age 6 for Work Registration or under age 14 for ABAWD)	Individuals included in the SNAP household via the Relationship and Program Request screens
Receipt of Unemployment Insurance benefits	Verified unemployment income on the Unearned Income tab of the Income screen
Meeting requirements of the TCA work program	A combination of the Program Eligibility for each household member and information on the Non-Compliance screen
Meeting work requirements through employment	Verified the number of hours and income on the Earned Income tab of the Income screen
Pregnancy	Pregnancy screen

E&E Work Exemption Screen

The Work Exemption screen in E&E reflects exemptions from Work Registration and will not trigger an ABAWD exemption or exception. On this screen, the eligibility worker must select the appropriate Work Registration exemption reason for each SNAP applicant or recipient.

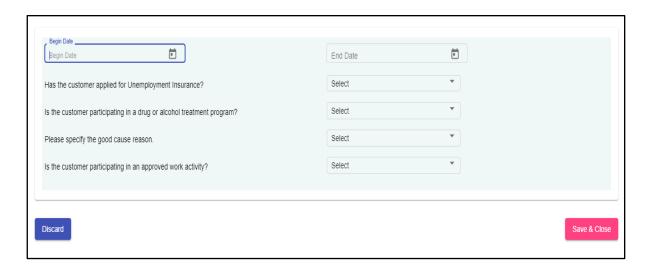


E&E ABAWD Screen

The ABAWD screen in E&E reflects exceptions from ABAWD that are not otherwise automatically evaluated (based on the information from the table on page 10 above). The following exceptions must be selected by the eligibility worker on the ABAWD screen in order for them to be applied to the individual:

- A. Applied for Unemployment Insurance benefits,
- B. Participating in a drug or alcohol addiction treatment or rehabilitation program,
- C. Participating in approved work activity for the required number of hours,
- D. Good cause.
- E. The NEW exceptions for Indian, Urban Indian, and California Indian (available beginning November 1, 2025).

Reminder: For ABAWD purposes, verification of exemptions/exceptions is only required in instances where information is questionable. See SNAP Manual Section 408 Verification for additional information.



Work Requirements Oral Script

During screening, eligibility workers are required to give a thorough verbal explanation of SNAP work requirements. To meet this requirement, eligibility workers will use the <u>Work Requirements Script for Eligibility Workers</u> (Updated 9/16/25).

SNAP Applications

Applicants must be screened for ABAWD using the new exception/exemption rules beginning November 1, 2025.

Active SNAP Cases

The updated ABAWD exceptions will apply the next time an individual is screened beginning November 1, 2025. Screenings take place at certification, redetermination, and interim change (including Maryland Benefit Reviews). Countable ABAWD months cannot be assigned unless the individual has been screened and the eligibility worker determines that no exception applies.

Verifying Work Activities

Ongoing verification throughout the certification period is not required once an employer or vendor verifies that the ABAWD is meeting the ABAWD work requirements. ABAWDs follow simplified reporting requirements with the additional reporting requirement to inform the agency if their participation hours drop below 20 hours per week, averaged to 80 hours per month. See

Section **106.9 Verifying Work Activities** of the SNAP manual for additional information on verifying work activities.

References

SNAP Manual Section 106 ABAWDS

SNAP Manual Section 130 Work Requirements

FNS Policy Memo-Supplemental Nutrition Assistance Program Provisions of the

OBBBA of 2025 – Information Memorandum

Maryland Work Requirements Oral Script (Updated 9_16_25)

ABAWD FAQ - attached below

ABAWD Screening – attached below

Inquiries

Please direct policy questions to FIA Policy by completing the <u>FIA Policy Information Request Form</u>. Montgomery County staff may submit their policy questions via email at <u>fia.policy@maryland.gov</u>.

cc: DHS Executive Staff

Constituent Services

DHS Help Desk

FIA Management Staff

Office of Administrative Hearings

Maryland SNAP: NEW ABAWD

Quick Reference Guide for LDSS (EFFECTIVE 11/01/2025)

Why this matters

H.R. 1 "OBBBA of 2025" expands federal work-reporting requirements for Able-Bodied Adults Without Dependents (ABAWDs) and removes several long-standing exemptions. Our Maryland Department of Human Services (DHS) case managers should be ready to explain how these changes affect eligibility, exemptions, and time limits.

General Eligibility

• **New Age Range:** ABAWD work rules now cover **18–64**.

Exemptions/Exceptions

Still in Effect:

- o Medically or physically unfit for work,
- Pregnancy,
- Participating in an alcohol or drug rehabilitation program,
- o Applied for or receiving unemployment.

New: Exceptions for individuals recognized as *Indian, Urban Indian, or California Indian* under the Indian Health Care Improvement Act.

Removed: Exceptions for veterans, people experiencing homelessness, and former foster youth.

Waivers: NONE

Questions to Consider:

Q1: What is the new age range for ABAWD work requirements?

Al: The new federal rule raises the ABAWD age range to 18-64.

- Old rule: 18–54 (with some special exemptions).
- New rule: 18–64.

 Customers aged 55–64 must now meet the 80-hour-per-month work rule or qualify for a different exemption.

Q2: A customer is 58 years old and was previously exempt. Is this customer now an ABAWD?

A2: Yes. Under the new law, the ABAWD age limit extends to age 65, so a 58-year-old customer will be subject to the work requirement.

Q3: When does the new policy apply to this customer/when must they begin work activities?

A3: This customer must be screened at and will be subject to the work requirement at their next redetermination unless they meet a different exemption.

Q4: What is the updated rule for caregivers with dependent children?

A4: Old rule: Exempt if caring for a child under 18.

New rule: Exempt only if caring for a child under **14**. Parents or caregivers of children 14+ must meet ABAWD work requirements unless another exemption applies.

Q5: Which exemptions were eliminated by H.R. 1?

A5: The new law removes exemptions for **veterans, individuals experiencing homelessness, and former foster youth.** Members of these groups are now required to meet the ABAWD work requirements unless another exemption applies.

Q6: Are there any new exemptions available?

A6: Yes. The law establishes new exemptions for individuals defined as an "Indian," "Urban Indian," or "California Indian" under the Indian Health Care Improvement Act.

Q7. Does Maryland DHS still have an ABAWD waiver?

A7. No. Maryland can no longer broadly waive the ABAWD time limit.

- After three "countable" months in a three-year period without meeting work requirements or another exemption, benefits end.
- Customers may regain eligibility by meeting the 80-hour work rule for 30 days or by newly qualifying for an exemption.
- Customers in these groups must now meet ABAWD work requirements or qualify for a different exemption (such as a verified medical condition

Meeting the Work Requirement

- Minimum Hours: 80 hours/month (20 per week, no averaging).
- Activities That Count:
 - Paid employment
 - Volunteer work for a nonprofit
 - SNAP Employment & Training (E&T) activities
 - Any combination totaling 80 hours/month.
- **Verification:** Pay stubs, employer letters, volunteer timesheets, or E&T participation records.

Non-Compliance & Regaining Benefits

- **Consequence:** Loss of benefits after three countable months in a 36-month period.
- **To Regain:** Work or participate in a qualifying program for 30 consecutive days, or qualify for a new exemption.

ABAWD Reporting & Documentation

- What to Collect: Work/E&T hours, pay stubs, volunteer logs, or medical documentation.
- When to Report: At recertification and/or within 10 days of the change.
 - Hours less than 20 hours per week must be addressed with customers in a timely manner.

Action Steps for Case Managers

- 1. **Identify affected customers** (ages 55–64, caregivers of children 14+, veterans, homeless individuals, former foster youth).
- 2. **Explain changes early** so customers can plan to meet the 80-hour requirement or seek an exemption.
- 3. Refer to SNAP E&T and other community work programs.
- 4. **Update case records** with new exemption codes, obtain verification(s) and narrate clearly.
- 5. **Provide resources** (job search assistance, training, mental/physical health referrals).
- 6. **Direct customers** to https://mymdthink.maryland.gov for updates, new program information, forms, etc.



What is ABAWD and its meaning? ABAWD stands for Able-Bodied Adults Without Dependents and is a term within the Supplemental Nutrition Assistance Program (SNAP) to identify individuals between the ages of 18 and 64 who are not disabled or who do not have children who are 13 years or younger. ABAWDs are only eligible for 3 months of SNAP benefits within a set 36-month period unless they meet certain work requirements or are exempt.

The ABAWD screening sheet below includes a series of questions to help determine whether someone is subject to work requirements since the passing of H.R.1. Screening must be completed at application, redetermination, and interim change (including Maryland Benefit Review) for each customer.

	ABAWD Screening Tool		
Hou	lead of Last: Case ID: Date: Sehold District Name: First: Office:		
/	Check YES OR NO for each question. Is anyone in your household:		
	ousehold Questions	YES	NO
1.	13 years of age or younger who is not on the SNAP case?		
2.	Native American: American Indian, Urban Indian, or California Indian?		
3.	Age 65 or older?		
	Pregnant?		
5.	Disabled, unable to work, or experiencing a temporary or permanent physical or mental condition that prevents your ability to work?		
6.	Responsible for providing care to an individual who requires assistance with daily living activities?		
7.	Receiving or have applied for any public or private disability or sick benefits, such as SSI, Workers Compensation, Veterans Disability Benefits, or vocational rehabilitation services?		
8.	Age 18 or older and enrolled in a vocational school, college, or training at least half-time?		
9.	Receiving or waiting for a determination for unemployment insurance benefits?		
10	. Participating in an alcohol or drug treatment program?		
11.	Receiving TCA and in compliance with the associated work program?		
/	Check YES OR NO and comment if needed. Is anyone in your SNAP ho	useho	ıld:
Er	nployment and Community Service Questions	YES	NO
12.	Engaged in community service or volunteering with a local agency?		
	ves, where? (company name) How many hours pe	er wee	k?
13.	Employed?		



If yes, where? (company name)	How many hours per week?

(✔Check YES OR NO) Are any of the remaining household members:

Good Cause Review		NO
Experiencing homelessness or facing homelessness?		
Having transportation difficulties?		
Unable to work due to a temporary or permanent physical or mental health condition, or facing barriers such as domestic violence?		
A migrant or seasonal farm worker?		
Experiencing childcare difficulties?		
Convicted of an offense and they are working unpaid in lieu of their sentence?		

CONCLUSION		YES	NO
Were any of the questions above answered "Yes"?			
If yes, please list the household member.	Which question(s)?		

Your eligibility worker may reach out to you for additional information based on the answers provided on this form.