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106.1 Purpose and Definitions

The purpose of this section is to describe SNAP policy regarding individuals who have the Time-Limited Participation designation of Able-Bodied Adults Without Dependents (ABAWDs). The following definitions apply to this section:

- A. **Able-Bodied Adult Without Dependents (ABAWD):** An individual 18-64 years of age who is able to work and who 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 three-month time limit unless they meet certain work requirements or qualify for an exemption or an exception. ABAWD is a Time-Limited Participation designation.
- B. **Exceptions:** Reasons for which an ABAWD is not subject to the three-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.
- C. **Exemptions:** Reasons for which 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.

106.2 General Requirements

- A. Individuals meeting the definition of ABAWD may not participate in SNAP if they have received SNAP benefits for three countable months during a set 36-month (three year) period, except under certain circumstances detailed in this policy.
 - a. 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.
- B. During these three-year periods, an individual meeting the ABAWD definition is limited to three countable months of SNAP benefits unless they comply with work requirements, qualify for an exemption, or meet an exception.

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106.2 General Requirements (continued)

- C. Once three countable months of SNAP benefits are issued, customers meeting the ABAWD definition are not eligible for SNAP benefits (including Expedited SNAP).
- D. As discussed in section 106.10, customers who have reached their three-month ABAWD time limit may regain eligibility by re-applying for SNAP and either:
 - a. Verifying that they are in compliance with the ABAWD work requirements (detailed below in section 106.6), or
 - b. Meeting the criteria for an exemption or exception to the ABAWD requirements (see 106.4 below).
- E. Countable months are months where an individual receives SNAP benefits for the full month while not:
 - a. Exempt from work activity due to one (1) of the exemptions/exceptions listed in section 106.4;
 - b. Covered by a waiver awarded by FNA;
 - c. Fulfilling the work requirements detailed in section 106.6;
 - d. Receiving prorated benefits for a part of a month; or
 - e. In the month of notification from a SNAP Employment and Training (SNAP E&T) provider determining non-compliance or unsuitability of the individual.
- F. Countable months do not have to be consecutive.
- G. ABAWD requirements apply statewide unless a particular area is granted a waiver by the federal Food and Nutrition Administration (FNA). Maryland does not currently have any waivers.

106.3 Screening

Screening is critical to the successful implementation of ABAWD (Time Limited Participation) policy. Screening is **required at each SNAP application and redetermination** or when adding an individual to an active SNAP case.

Identifying customers who are not subject to ABAWD requirements can help local departments reduce the number of customers who must be tracked

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106.3 Screening (continued)

and monitored for compliance with work requirements. Failure to screen individuals may result in households being underpaid or overpaid SNAP benefits. Payment errors will count toward our Quality Control (QC) SNAP payment error rate.

The Eligibility and Enrollment (E&E) system is automated to complete ABAWD screening for each individual based on the case information entered.

A Local Department of Social Services (LDSS) may elect to use an ABAWD screening tool separate from E&E. A printable copy of a screening tool is available for the LDSS office, SNAP outreach partners, and other community partners who assist us with screening when they complete an application for a customer requesting SNAP benefits. Whenever an external screening tool is used, it must be scanned or uploaded to Case Documents in E&E.

NOTE: Remember that if the information in E&E is not correct and/or verification is not scanned and uploaded into Case Documents, it is the same as if it does not exist.

106.4 Exceptions and Exemptions from ABAWD Time Limited Participation

The three-month ABAWD time limit does not apply to individuals who meet any of the following exception or exemption criteria: :

- A. Under age 18.
- B. Age 65 or older.
- C. Determined by the state agency to be medically certified as physically or mentally unfit for employment. An individual is medically certified as physically or mentally unfit for employment if they:
 - a. Are receiving temporary or permanent disability benefits issued by governmental or private sources;
 - b. Are obviously mentally or physically unfit for employment as determined by the state agency or eligibility worker;
 - c. Provide a statement from a (licensed) physician, physician's assistant, nurse, nurse practitioner, designated representative of the physician's office, psychologist, social worker, or any other medical personnel the state agency determines appropriate; or

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106.4 Exceptions and Exemptions from ABAWD Time Limited Participation (continued)

- i. The **Verification of Disability form (FIA 500-A)** can be used for this. It contains one section that the customer completes, and a second section that must be completed and signed by a certified, licensed health professional.
- d. Are experiencing chronic homelessness.
 - i. A person experiencing chronic homelessness is an individual who lacks a fixed and regular nighttime residence, which includes living in 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. A person is also experiencing chronic homelessness if they are living in environments without access to toilets or where basic hygiene or stable sleep cannot be maintained.
 - ii. 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.
- D. Residing in the household of a member under age 14, even if the household member who is under 14 is not eligible for SNAP themselves.
 - a. This exception expires the month after the youngest child in the SNAP household turns 14.
- E. Pregnant.
- F. Exempt from Work Registration for one of the following reasons:
 - a. They are experiencing physical or mental barriers to work,
 - b. They are responsible for the care of a child under age 6 or a person who needs help caring for themselves,

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106.4 Exceptions and Exemptions from ABAWD Time Limited Participation (continued)

- c. They are going to school, college, or a training program at least half-time (student policy prevails in this situation, see SNAP Manual Section 102 Students),
- d. They are receiving or have applied for unemployment benefits,
- e. They are meeting the work requirements for Temporary Cash Assistance (TCA),
- f. They are working 30 hours or more per week or earning at least \$217.50 per week (federal minimum wage times 30 hours), or
- g. They are participating in a substance use disorder or alcohol treatment and rehabilitation program.

G. Indian, meaning any individual who is:

- a. A member (or who has a parent or grandparent who is a member) of an Indian tribe, even if the tribe is no longer recognized by the federal government or if the recognition was terminated, or any other organized group or community (including any Alaska Native village or group) which is recognized as eligible for the special programs and services provided by the United States to Indians because of their status as Indians;
- b. An Alaska Native (including Inuit, 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 Health and Human Services.

H. California Indian, meaning any individual who is:

- a. A member of a state or federally recognized California Indian tribe;
- b. 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

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106.4 Exceptions and Exemptions from ABAWD Time Limited Participation (continued)

- 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.
- I. Urban Indian, meaning any individual who is an Indian (as defined in sec. G of this section) **AND** is living in an urban center. An **urban center** means any city with a population of 10,000 or more, which the Secretary of Health and Human Services determines has a sufficient urban Indian population with unmet health needs and meets any one or more of the following criteria:
 - a. Irrespective of whether they live on or near a reservation, is a member of a tribe, band or other organized group terminated since 1940 and those recognized now or in the future by the State in which they reside, or who is the natural child or grandchild of any such member;
 - b. Is an Aleut or other Alaska Native;
 - c. Is considered by the Secretary of the Interior to be an Indian for any purpose; or
 - d. Is determined to be an Indian under regulations promulgated by the Secretary.
- J. Have a Discretionary Exemption.
 - a. Discretionary Exemptions are applied based on criteria determined by DHS and applied automatically through the E&E system. Each year, the Food and Nutrition Administration (FNA) awards every state an allotment of Discretionary Exemptions with the goal of preventing SNAP recipients from losing benefits due to their inability to find appropriate work activities. One Discretionary Exemption is applied for each otherwise countable month used by a person meeting the ABAWD definition. Discretionary Exemptions are exclusively applicable to customers meeting the ABAWD definition who do not qualify for any other exemption or exception as outlined in this section.

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106.5 Notices

When a customer is identified through screening as meeting the definition of ABAWD, the agency is required to inform the customer, both orally and in writing, of the work requirements and the three-month time limit.

- A. **Oral Notification:** An eligibility worker must provide a verbal explanation of the ABAWD work requirements and three-month time limit. The worker must also rule out available exceptions and exemptions.
- B. **Written Notification:** E&E will automatically generate a Consolidated Work Notice as part of the SNAP approval letter once the case is finalized. Warning notices are also automatically generated when a customer meeting the ABAWD definition uses a countable month. These notices explain the work requirements and inform the customer of the number of months remaining out of the three-month time limit.

106.6 Work Registration and Work Activity Requirements

SNAP has both work registration and work activity requirements.

- A. **Work Registration:** SNAP customers who do not meet an exemption or exception from ABAWD 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. Self-employed individuals meeting the ABAWD definition must complete work registration if they are working less than 30 hours per week.
- B. **Work Requirements:** A customer meeting the ABAWD definition must document that they participate in any combination of qualified work activities for a total of 20 hours per week or an average of 80 hours per month.
 - a. Qualified work activities are:
 - i. Working (at a job or self-employed);
 - ii. Participating in and complying with a Workforce Innovation and Opportunity Act (WIOA) program, Trade Adjustment Assistance Act program, or SNAP E&T program (other than job search or job search training program);

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106.6 Work Registration and Work Activity Requirements (continued)

- iii. Participating in a work experience program governed by the Fair Labor Standards Act (FLSA) requirements; or
 - iv. Volunteering at a non-profit organization.
- b. Customers designated as ABAWD must verify work activity participation **weekly** if the activities are outside of a SNAP E&T program (local in-house programs and third-party partners).
- c. ABAWD-designated customers follow simplified reporting requirements **and** must report if their work activity hours drop below 20 hours per week or 80 hours per month.

106.7 Work Activity Tracking

When the SNAP case is finalized, E&E will automatically transmit case information to WORKS, the system that Maryland uses to track work activity and compliance. For ABAWD-designated customers who are not meeting the work requirement through employment and are not exempt, work activity is managed in WORKS by the LDSS or a SNAP E&T vendor contracted by the state.

106.8 Good Cause

Good Cause is defined as reasons beyond an individual's control that prevent their compliance with ABAWD work requirements.

- A. Good cause includes circumstances beyond the customer's control such as, but not limited to:
 - a. Illness,
 - b. Illness of another household member requiring the presence of the member,
 - c. A household emergency, or
 - d. The unavailability of transportation.
- B. If a customer meeting the ABAWD definition would have fulfilled their work requirement but missed some hours for good cause, the agency may consider the customer to have fulfilled the requirement as long as the absence is temporary and the customer expects to return to the activity.

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106.8 Good Cause (continued)

- C. If an ABAWD-designated customer is granted good cause, the eligibility worker must narrate the reason thoroughly in E&E.
- D. Verification is only required for good cause when the information provided requires additional confirmation.

106.9 Verifying Work Activities

Ongoing verification throughout the certification period is not required after an employer or vendor verifies that the ABAWD-designated customer is meeting the ABAWD work requirements.

Customers meeting the ABAWD definition follow simplified reporting requirements **with the additional requirement to inform the agency if their participation hours drop below 20 hours per week or an average of 80 hours per month.**

DHS created the **Verification of Participation in an Activity form (FIA 500-B)** form for the LDSS and/or vendor to use to verify ABAWD work activity information. This form contains two sections that require both the customer and the customer's supervisor to complete. The supervisor's signature is also required in each section. FIA workers must assist the customer in completing their portion of the form, if necessary. Completed forms must be returned to the LDSS and are accepted by mail, fax, in-person, or by uploading them directly into the [Maryland Benefits Consumer Portal](#).

Reminder: If the customer is physically or mentally unfit for employment, they may fill out the **Verification of Disability form (FIA 500-A)**. See 106.4C for more information.

106.10 Regaining Eligibility

- A. When an ABAWD-designated customer uses their third countable month of the three-month time limit and they are not exempt from work requirements or they are not meeting the work requirements, E&E will automatically close the SNAP case. See 106.2 above for information on what is considered a countable month.
- B. A customer that has lost their SNAP benefits due to reaching the ABAWD three-month time limit can regain eligibility for SNAP benefits after the date the case closes by re-applying for SNAP and:

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106.10 Regaining Eligibility (continued)

- a. Verifying that they worked or participated in a work activity for 20 hours per week or an average of 80 hours per month in the last 30 days, or
 - b. Meeting the criteria for an exemption or exception.
- C. When a customer who reached the ABAWD time limit successfully regains SNAP eligibility, they are eligible for continued SNAP benefits as long as they continue to either meet the ABAWD work requirements or meet the criteria for an exemption or exception.
- D. If the customer regains eligibility through employment and later stops meeting the work requirements, the customer is eligible for three additional months of **consecutive** SNAP benefits beginning the month after the employment is removed from the case.

Example: Ms. Forrester meets the definition of ABAWD. She reaches her three-month ABAWD time limit after having countable months in July 2026, August 2026 and December 2026. Her SNAP case closed on December 31st because she was not meeting SNAP work requirements. In February 2027, Ms. Forrester reapplied for SNAP benefits. She verifies that she is now working 20 hours per week, meeting the ABAWD work requirements, and begins getting benefits again. In May 2027, Ms. Forrester reported that she's been laid off from work and is not eligible for Unemployment Insurance. She is eligible for three additional months of consecutive SNAP benefits without meeting ABAWD work requirements or an exception/exemption. She receives benefits in June, July, and August 2027. To continue receiving benefits after August 2027, Ms. Forrester must either meet ABAWD work requirements or meet the criteria for an exemption or exception.

106.11 Reporting Changes

Customers meeting the ABAWD definition are subject to simplified reporting **except when their work hours drop below 20 hours per week or an average of 80 hours per month.** A change in work hours below 20 hours a week must be reported **within 10 calendar days of the change.**

106.12 Benefits Received in Error

If a customer who is subject to the ABAWD work requirements receives SNAP benefits when they are not eligible, then the benefits are overpaid. The

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106.12 Benefits Received in Error (continued)

The customer must repay the SNAP benefits received in error whether the agency or the customer made the mistake. The eligibility worker must process the benefit error in E&E. For detailed procedures on overpayments, please see [Section 490, Claims Against Households](#)