



DATE: **October 27, 2025**

OPERATIONS MEMORANDUM 25-10-02

SUBJECT: Expansion of the Supplemental Nutrition Assistance Program (SNAP)
 Time Limit Effective November 1, 2025

TO: Executive Directors

FROM: Robert Hixson
 Director
 Bureau of Operations

PURPOSE

This memo provides guidance for the expansion of time-limited SNAP to additional individuals, creation of a new federal exemption, and phasing out of other federal exemptions effective November 1, 2025.

SUMMARY AND CHANGES

| OLD POLICY | NEW POLICY |
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| All adults who lived in a SNAP household with a child under 18 were exempt from the SNAP time limit. | Adults living in a SNAP household where the youngest child is 14 or older are now subject to the SNAP time limit unless meeting a different exemption or the work requirement. |
| Adults aged 18- 54 were subject to the SNAP time limit unless meeting an exemption or the work requirement. | Adults aged 18- 64 are now subject to the SNAP time limit unless meeting an exemption or the work requirement. |
| Veterans were exempt from the SNAP time limit. | Veterans are now subject to the SNAP time limit unless they meet a different exemption or the work requirement. |
| Former foster youth aged 18-24 were exempt from the SNAP time limit. | Former foster youth aged 18-24 are now subject to the SNAP time limit unless meeting a different exemption or the work requirement. |
| All homeless individuals were federally exempt from the SNAP time limit. | Homeless individuals will receive either a federal exemption or a state Discretionary Exemption depending on their situation. |

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| Native American individuals did not receive a categorical exemption from the SNAP time limit. | Individuals who are “Indians”, “Urban Indians”, or “California Indians” are now exempt from the SNAP time limit. |
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BACKGROUND

Federal regulations limit certain SNAP recipients to three months of SNAP benefits in a 36-month period, unless they meet a work requirement or exemption. The 2025 federal reconciliation law ([Pub. L. 119-21](#)), signed on July 4, 2025, significantly changed federal exemption criteria.

DISCUSSION

New Name for Time-Limited Population

In light of the changes to exemptions detailed below, the County Assistance Office (CAO) will no longer use the terms “Able-Bodied Adult without Dependents” or “ABAWD” to refer to this population. Instead, the CAO should utilize the terms “SNAP Work Requirements” and “the SNAP Time Limit” to refer to the time limit rule generally and Pennsylvanians with Employment or Engagement Requirements for SNAP (“PEERs”) to refer to the people subject to that rule.

Federal Exemptions Ending

Under Pub. L. 119-21, the following groups will **no longer** be federally exempt, effective November 1:

Adults Living with Older Children

Adults living in a SNAP household where the youngest child is age 14–17 will now be subject to the SNAP time limit unless otherwise exempt or meeting work requirements.

NOTE: All adults living in a SNAP household with a child under 14 continue to be exempt. The CAO will assign Qual Code 22 to these individuals.

Older Adults Age 55–64

Individuals age 55–64 will now be subject to the SNAP time limit unless otherwise exempt or meeting work requirements.

New SNAP applicants age 55-64 will be assigned Eligibility Status Code “EB” by the Electronic Client Information System (eCIS), and the CAO will be required to assign an appropriate SNAP Qual Code.

Veterans and Former Foster Youth Age 18-24

Veterans and former foster youth age 18-24 will now be subject to the SNAP time limit unless otherwise exempt or meeting work requirements.

NOTE: Veterans receiving Veterans Affairs Disability benefits of 10 percent or higher are exempt as Qual Code 2.

Homeless Individuals

Pub. L. 119-21 eliminated the federal exemption for homelessness; however, these individuals will remain exempt under either the federal unable to work exemption (Qual Code 10) or a state exemption (Qual Code 9). See: [OPS 25-10-03](#).

Ongoing Recipient Federal Exemption Unwinding

As of November 1, the CAO shall no longer assign SNAP Qual Codes 1, 12, 13, or 14 at application or renewal or change existing SNAP recipients to these codes.

The CAO will allow individuals receiving SNAP under SNAP Qual Codes 1, 12, 13, 14, or Eligibility Status Code EM to maintain that exemption until their next full renewal, at which time the CAO will screen to assign the most appropriate Qual Code. ECIS will permit these codes to remain in place in non-Reapplication workflows but will not allow the CAO to newly assign the Qual Codes to individuals moving forward.

New Federal Exemption

Under Pub. L. 119-21, the following group will now **gain** a federal exemption, effective November 1:

Native Americans

Native Americans who meet the definition of an “Indian”, “Urban Indian”, or “California Indian” under the Indian Health Care Improvement Act (25 U.S.C. 1607 *et seq.*) will now be federally exempt from the SNAP time limit. The CAO will assign Qual Code 15 to an individual who is:

An “Indian”, defined as:

- A member of any Indian tribe, band, nation, or other organized group or community, including any Alaska Native village or group or regional or village corporation as defined in or established pursuant to the Alaska Native Claims Settlement Act, which is recognized as eligible for the special programs and services provided by the federal government to Indians because of their status as Indians.

An “Urban Indian”, defined as someone who:

- Resides in a community which has a sufficient urban Indian population with unmet health needs to warrant assistance under subchapter IV of the IHICA, as determined by the Secretary of Health and Human Services; **and**
- Meets at least one of the following four criteria:
 - Regardless of if they live on or near a reservation, is a member of a tribe, band, or other organized group of Indians, including those tribes, bands, or groups terminated since 1940 and those recognized now or in the future by the State in which they reside, or who is a child or grandchild or such a member;
 - Is an Eskimo or Aleut or other Alaska Native; or
 - Is determined to be an Indian for any purpose under regulations promulgated by the Secretary of the Interior or the Secretary of Health and Human Services

Or a “California Indian”, defined as someone who:

- Is a descendant of an Indian of California who is listed on the plans for distribution of the assets of rancherias and reservations located within the State of California under the Act of August 18, 1958 (72 Stat. 619);
- Holds trust interests in public domain, national forest, or reservation allotments in California; **or**
- Is a descendant of an Indian who was residing in California on June 1, 1852, provided the descendant is—
 - a member of an Indian community; and
 - regarded as an Indian by the community in which they live.

The CAO must accept a client’s statement as verification the exemption is met unless questionable.

Time Limit Coding and Desk Guide Update

ECIS has been updated to display the SNAP Qual Codes in the order of priority in which they should be assigned, rather than numeric order:

| Code | Definition | Notes |
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| 22 | *NEW* Resides in a SNAP household with a child under 14 | |
| 02 | Disabled or receives federal or state disability | |
| 03 | Meets federal Employment and Training (E&T) exemption codes 04, 12, 14, 17, 20, or 21 | |
| 04 | Pregnant | |
| 10 | Unable to work as determined by the Department of Human Services | Includes chronically homeless |
| 15 | *NEW* Federally recognized Native American | |
| 05 | Working at least 20 hours/week averaged monthly | |
| 06 | Participating in E&T approved activity except job search/prep (20 hours/week) | |
| 07 | Participating in a workfare program | |
| 16 | *NEW* Expedited SNAP, pending exemption or work verification | |
| 09 | Meets state E&T exemption codes 15, 16, or 19 | Includes non-chronically homeless |
| 11 | ABAWD time limit expiration appeal | |
| 20 | Does not meet an exemption or the work requirement | |
| 21 | Regained eligibility as designated in SNAP HB 536.25 | |
| 01 | *OLD* Resides in a SNAP household with a child under 18 | <i>Discontinue use at application or renewal as of November 1; may remain until renewal</i> |
| 12 | *OLD* Homeless | |
| 13 | *OLD* Military Veteran | |
| 14 | *OLD* Former Foster Youth 18-24 who aged out | |

The ABAWD Verification Desk Guide and Narrative Tool has been renamed the [SNAP Work Requirements Desk Guide](#) and has been updated to reflect new policy. It now includes the previous SNAP Employment and Training Program Qualification Code Desk Guide, as well as practical examples illustrating when and how the CAO may utilize each code.

NEXT STEPS

1. Share and review this information with appropriate staff members.
2. Direct questions regarding this Operations Memorandum to your Area Manager.