



DATE: August 19th 2025

OPERATIONS MEMORANDUM #25-08-03

SUBJECT: Return of the Supplemental Nutrition Assistance Program (SNAP) Time Limit

TO: Executive Directors

FROM: Robert Hixson
Director
Bureau of Operations

PURPOSE

To provide information on the end of the SNAP Able-Bodied Adult without Dependent (ABAWD) Time Limit geographic waiver effective September 1, 2025.

SUMMARY AND CHANGES

OLD POLICY	NEW POLICY
Most counties and cities in Pennsylvania were waived from the time limit.	All areas in Pennsylvania will be subject to the time limit. These requirements will take effect on September 1 for individuals assigned SNAP Qual Code 20.
Some current SNAP recipients have been temporarily exempted using ETP Code 27 and Qual Code 9.	All individuals assigned ETP Code 27 and Qual Code 9 will be transitioned to ETP Code 30 and Qual Code 20 by October 1 and become subject to the time limit at that time.

BACKGROUND

Federal regulations limit able-bodied adults aged 18 through 54 with no dependents (ABAWDs) to receiving three months of SNAP in a 36-month period, unless they meet an ABAWD work requirement. The 2025 federal reconciliation law (Pub. L. 119-21) modified the requirement for states to receive geographic waivers of this rule.

DISCUSSION

The current waiver approved by the federal Food and Nutrition Service (FNS) will end on August 31, 2025. Due to the new law, no areas in Pennsylvania will qualify for a waiver after that date.

For all SNAP applications and renewals received after September 1, the CAO will follow the existing process in the ABAWD Verification Desk Guide ([Attachment](#)) to identify an appropriate Qual. Code for each 18-54-year-old SNAP recipient.

In September, eCIS will be updated to convert SNAP recipients from Eligibility Status Code EW to EB. At that time, the ABAWD clock will start for new SNAP applicants and current SNAP recipients with SNAP ETP Code 30 and Qual Code 20.

Certain current SNAP recipients were temporarily assigned an exemption using ETP Code 27 and Qual Code 9. Automatic code conversions to revert these individuals to ETP Code 30 and Qual Code 20 will be completed by October 1, and the affected individuals will become subject to the time limit at that time.

CM 558 Mass Mailing

Headquarters sent a mass mailing of the [CM 558](#) form to 18-54-year-old SNAP recipients coded Qual Code 20. This was done to help screen these individuals for potential exemptions.

CAO Responsibilities

Review Returned CM 558s Timely:

- If a CM 558 is returned to the CAO, action must be taken within the month the CM 558 was returned to ensure the ABAWD Clock doesn't improperly increase.
- The CAO will review the CM 558 to check if:
 - The client's statement on the CM 558 can be accepted as verification of an exemption unless questionable (Qual. Codes 1, 3, 4, 9, or 12-14).
 - The client's statement on the CM 558 requires further verification of exemption unless obvious or verified electronically (Qual. Codes 2, 10).
 - The client's statement on the CM 558 requires further verification they are meeting requirements unless verified electronically (Qual. Codes 5-7).

Verification:

- The CAO will send a PA 253 if further verification is necessary.

Update Qual Codes:

- If the CAO finds that one (or more) of the Qual Codes applies during their review, they will:
 - Update the Qual Code in the case record.
 - Narrate the reason for the update using the [ABAWD Verification Desk Guide and Narrative Tool](#).

Handling Indeterminate Cases:

- If the CAO cannot determine an appropriate Qual Code from the review, they must narrate that:
 - The CM 558 did not provide enough information to conclude the individual qualifies for a federal exemption or meets the work requirement.

NEXT STEPS

1. Share and review this information with appropriate staff members.
2. Direct questions regarding this Operations Memorandum to your Area Manager.
3. This Operations Memorandum is in effect until further notice.

ATTACHMENTS

Attachment – [ABAWD Verification Desk Guide and Narrative Tool](#)