



**DATE:**        **October 27, 2025**

**OPERATIONS MEMORANDUM 25-10-03**

**SUBJECT:**    Updates to the Use of Discretionary Exemptions (DEs) from the Supplemental Nutrition Assistance Program (SNAP) Time Limit

**TO:**            Executive Directors

**FROM:**        Robert Hixson  
                     Director  
                     Bureau of Operations

**PURPOSE**

This memo provides updates to Pennsylvania’s DE criteria effective November 1, 2025.

**SUMMARY AND CHANGES**

<b>OLD POLICY</b>	<b>NEW POLICY</b>
All homeless individuals received federal exemption.	Homeless individuals will now receive either a federal exemption or a DE depending on whether they are chronically homeless.
All expedited SNAP recipients who had not yet verified they met any other exemption or the work requirement at the time expedited benefits were issued received a DE for the expedited period.	All individuals approved for expedited SNAP will receive a federal exemption for the partial month in which benefits are issued. This includes individuals applying on the 2nd through the 15th of the month.  A federal exemption will be applied if the expedited period includes a full calendar month <b>unless</b> the individual has been screened and determined to not meet any exemption or comply with work requirements at application. This includes individuals who apply on the 1st OR on or after the 16th of the month.

Full-time AmeriCorps Volunteer in Service to America (VISTA) volunteers received a DE.	AmeriCorps VISTA volunteers will now receive a federal exemption due to receiving in-kind pay.
Individuals expected to return to work within 60 days received a DE.	Individuals who enroll in a 60-day SNAP Employment and Training (E&T) supervised job search period (AC-89) after completing a training program will now be eligible for this exemption.

<b>OLD PROCESS</b>	<b>NEW PROCESS</b>
Individuals expected to return to work within 60 days receive a DE and have no specific certification period assigned based on this.	Effective November 1, individuals receiving this exemption will be assigned a three-month certification period and be change-reporting households.

## **BACKGROUND**

Federal regulations limit certain SNAP recipients aged 18 through 64 to receiving three months of SNAP in a 36-month period, unless they meet the work requirement, a federal exemption, or a DE. The 2025 federal reconciliation law ([Pub. L. 119-21](#)) made several changes to federal exemptions, which were announced in [OPS 25-10-02](#). It also necessitates changes to Pennsylvania's DE criteria.

## **DISCUSSION**

Effective November 1, DE criteria will change to allow all homeless individuals to maintain access to SNAP, prioritize federal exemptions over DEs, and ensure Pennsylvania does not exceed the eight percent DE limit.

### **Homeless Individuals**

The categorical federal exemption for homelessness (Qual Code 12) is ending. Current recipients will continue to receive that exemption until their next renewal, even if they report changes during the certification period.

The County Assistance Office (CAO) will assign homeless individuals one of the following Qual Codes:

Homeless Status	SNAP Employment and Training Program (ETP) Code	SNAP Qual Code	Criteria
Non-Chronically Homeless	16	9	Homeless for less than six months <b>AND</b> Not been intermittently homeless in the past two years (DE).
Chronically Homeless	26	10	Homeless for six months or more <b>OR</b> Been intermittently homeless in the past two years (Federal Exemption).

If an individual indicates they are homeless, the CAO must ask how long the individual has been homeless. If their answer indicates they meet one of the definitions above, the CAO must accept their statement unless questionable.

At renewal, the CAO must review to determine if the individual is now chronically homeless. If the CAO does not update the individual's ETP or Qual Code at renewal, a green error message will remind the CAO to review the recipient for chronic homelessness.

### Expedited SNAP

The CAO must process expedited SNAP using the appropriate SNAP ETP and Qual Codes applicable to the applicant's situation:

Criteria	Current EB-20 Clock Value	SNAP ETP Code	SNAP Qual Code	Action
Already verified to be exempt or meet work requirement at time of the expedited determination.	Any	Code which applies	Code which applies	Process expedited SNAP using appropriate SNAP ETP and Qual Code.  If able, the CAO may process ongoing SNAP in the same workflow.

**NOTE:** Accept client statement as verification for most exemptions unless questionable.

Criteria	Current EB-20 Clock Value	SNAP ETP Code	SNAP Qual Code	Action
Applicant states they <i>may</i> be exempt or meet work requirements but, at the time of the expedited determination, their exempt/meeting requirements status has not yet been verified.	0 – 2	23	16	Issue expedited SNAP as Qual Code 16 (now federally exempt). <b>No longer use Qual Code 9.</b> Request verification using the PA 253 and pend ongoing SNAP until verification is received.
	3	Not Applicable (N/A)	N/A	Deny expedited service. Pend ongoing SNAP determination.  If meeting requirement or exempt status is verified, re-evaluate for expedited (See: <a href="#">SNAP HB 506.42</a> ).
Applicant determined to not meet <i>any</i> exemption <u>and</u> not meet work requirement at the time of the expedited determination.	0 – 2	30	20	Issue expedited SNAP. Do <u>not</u> grant a DE. <b>If the expedited period includes a full calendar month, the applicant will incur a countable month.</b>
	3	30	20	Deny expedited service. Deny ongoing SNAP using Reason Code 660.

### Expected to Return to Work in 60 Days

The CAO will assign SNAP ETP Code 15 and SNAP Qual Code 9 to SNAP recipients who meet no federal exemption and are not meeting the work requirement, but who are expected to return to work in 60 days. Use of this code is limited to no more than three months per instance (60 days plus an additional 30-day grace period to allow the client time to verify whether work has resumed).

An individual may receive this exemption if they:

- have recent work history, defined as:
  - were employed within the last six months; or

- recently completed a SNAP E&T training activity (AC-84, 85, 86, 87, 88, or 91) and are now in a job search activity (AC-89).
- reasonably anticipate resuming work of at least 20 hours per week in the next 60 days; and
- do not meet the requirements for EB-21.

The CAO will use electronic data sources, such as Exchange 1 WAGE data, to verify recent work history. When initially granting this exemption, the CAO may accept the individual's statement that they anticipate resuming work unless questionable.

Effective November 1, individuals receiving this exemption will be assigned a three-month certification period and be change-reporting households. If the CAO does not alter the individual's SNAP ETP Code and SNAP Qual Code at renewal, a green error message will remind the CAO to review whether the exemption remains valid.

If the individual has not returned to work by the time of the renewal, the CAO must presume that the individual is no longer reasonably anticipated to resume work within the next 60 days. The individual may rebut this presumption by providing verification that they will resume work within 60 days.

### **AmeriCorps VISTA**

The CAO will no longer assign ETP Code 6 to full-time AmeriCorps VISTA volunteers. These individuals' participation hours and the stipend they receive are considered in-kind work for work requirement purposes only. The [AmeriCorps VISTA stipend rate](#) exceeds 30 times the minimum wage per week. Therefore, the CAO will federally exempt all full-time VISTA volunteers using SNAP ETP Code 17 and Qual Code 3. Headquarters will deactivate ETP Code 6 after all individuals have been transitioned to ETP Code 17 and Qual Code 3.

### **Desk Guide Update**

The [SNAP Work Requirements Desk Guide](#) has been updated to reflect these changes to policy. It now includes practical examples of when the CAO may assign a DE and when assigning a federal exemption is more appropriate.

### **NEXT STEPS**

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