



DATE: June 11, 2026

SUBJECT: Supplemental Nutrition Assistance Program (SNAP) Provisions of the One Big Beautiful Bill Act of 2025 – Time Limit Changes – Questions and Answers #1

TO: SNAP State Agencies, All Regions

On July 4, 2025, President Donald J. Trump signed into law, P.L. 119-21, the [One Big Beautiful Bill Act of 2025](#) (OBBB). On October 3, 2025, the Food and Nutrition Administration (FNA) published implementation memoranda on the SNAP provisions of the OBBB related to changes for time-limited participants (formerly known as able-bodied adults without dependents (ABAWDs)).<sup>1</sup>

These questions and answers provide additional information on implementing Section 10102 of the OBBB, which changes exceptions from the time limit, restricts waivers of the time limit, and allows for good faith exemptions for Alaska and Hawaii. State agencies with additional questions should contact their respective regional office representatives.

Sincerely,

Ronald Ward

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Supplemental Nutrition Assistance Program

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Enclosure

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<sup>1</sup> See the following memoranda published October 3, 2025. [Supplemental Nutrition Assistance Program \(SNAP\) Provisions of the One Big Beautiful Bill Act of 2025 - ABAWD Exceptions - Implementation Memorandum](#) and [Supplemental Nutrition Assistance Program Provisions of the One Big Beautiful Bill Act of 2025 – ABAWD Waivers - Implementation Memorandum](#)

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**Supplemental Nutrition Assistance Program (SNAP)**  
**Time Limit Provisions of the One Big Beautiful Bill Act of 2025 (OBBB)**  
**Question and Answer #1**

**A. Changes to Exception Criteria**

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*A.1 Increase in Upper Age Limit*

**1. Did the OBBB change the definition of “elderly”?**

No. The OBBB increases the age of those subject to the time limit from those aged 18 through 54 to those aged 18 through 64. However, the OBBB did not amend the definition of “elderly” at Section 3(j) of the Food and Nutrition Act (“the Act”), defined as “60 years of age or older.” Therefore, State agencies must continue to apply other policies for elderly individuals to those aged 60 or older, such as the availability of excess medical deduction and the lack of a cap on excess shelter deduction.

**2. Are individuals aged 60 to 64 subject to the general work requirements?**

No. The OBBB did not change who is subject to the general work requirements. Individuals aged 60 to 64 are not subject to the general work requirements, per section 6(d)(1)(A) of the Act.

While FNA has historically referred to time-limited participants as a subset of the individuals subject to the general work requirements, now there is a group of individuals who are subject to the time limit even though they are not subject to the general work requirements.

**3. Can State agencies require time-limited participants aged 60 to 64 to participate in mandatory employment and training?**

No. State agencies may not require individuals aged 60 to 64 to participate in mandatory employment and training (E&T). These individuals may voluntarily participate in E&T.

**4. Are individuals aged 60 to 64 subject to the time limit even though they are exempt from the general work requirements based on age?**

Yes. Individuals aged 60 to 64 are subject to the time limit, unless they meet another exception.

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The Act excepts individuals from the time limit if they meet an exemption from the general work requirements at Section 6(d)(2). Age is not a listed exemption in Section 6(d)(2). If an individual aged 60 to 64 also meets an exemption from the general work requirements, such as being responsible for the care of an incapacitated person, then they are not subject to the time limit.

**5. If an individual aged 60 to 64 is receiving Social Security benefits, are they subject to the time limit?**

Not necessarily. The Act does not provide an exception from the time limit for individuals receiving Social Security benefits. Social Security benefits refer to a broad range of benefits and may indicate that an individual is eligible for an exception. For example, an individual receiving disability benefits, such as Social Security Disability Insurance (SSDI) or Supplemental Security Income (SSI), would indicate the individual is medically certified as physically or mentally unfit for employment per 7 CFR 273.24(c)(2)(i). However, receipt of Social Security retirement and survivor benefits alone<sup>2</sup> would not qualify an individual to meet an exception under the Act.

*A.2 Changes to the Exception for Dependent Children*

**6. Does the exception for a dependent child in the household under age 14 require that the child is part of the same SNAP household?**

Yes, per 7 CFR 273.24(c)(3), the dependent child must be a part of the same SNAP household, as defined at 7 CFR 273.1(a), for the adult to qualify for the exception. For example, if an adult is the parent of a child under 14 who is not in the same SNAP household, then, the adult would not qualify for the exception.

**7. Does the OBBB change the meaning of a dependent child for other SNAP policies?**

No. The OBBB change only applies to the exception from the time limit for a parent or other member of a household with responsibility for a dependent child at Section 6(o)(3)(c) of the Act. It does not change the understanding of dependent for other SNAP policy, such as the dependent care deduction.

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<sup>2</sup> Individuals can typically get monthly Social Security retirement benefits starting at age 62 if they have worked and paid Social Security taxes for 10 years or more. In addition, spouses and survivors may qualify for benefits at earlier ages.

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### A.3 *Implementation Requirements*

#### **8. When must State agencies screen individuals for exceptions from the time limit?**

At a minimum, State agencies must screen for exemptions from the general work requirements and all exceptions from the time limit at certification and recertification, in accordance with 7 CFR 273.7(b)(3) and 7 CFR 273.24(k). FNA strongly encourages State agencies to also screen individuals newly subject to the time limit for exceptions during the certification period. Screening must include all exceptions, including the modified exception criteria per Section 10102(a) of the OBBB.

#### **9. Does OBBB change verification requirements for exceptions from the time limit?**

No. State agencies must continue to follow verification requirements at 7 CFR 273.2(f) and 273.24(l), including accepting multiple forms of documentary evidence or collateral contacts.

#### **10. What are examples of acceptable verification for the new exceptions for “Indians,” “Urban Indians,” or “California Indians”?**

State agencies must continue to follow verification requirements at 7 CFR 273.2(f) and 273.24(l), including accepting multiple forms of documentary evidence or collateral contacts. The type of documentation available and the ability to access such documentation will vary across Tribal organizations and individuals with different statuses. Examples of verification may include, but are not limited to:

- Certification Degree of Indian Blood card;
- Documentation or correspondence from a Tribe indicating the individual is a member, such as a Tribal enrollment card;
- Documentation or correspondence from the Indian Health Service showing eligibility for IHS services as an American Indian/Alaska Native; or
- Data sharing and/or collateral contact from another agency or program, such as the Indian Health Service, the Centers for Medicare and Medicaid Services, the Department of Health and Human Services, or the Department of the Interior.

Note: Regardless of the type of documentation provided, the State agency must ensure the individual meets the definition outlined in Section 6(o)(3)(F) and (G) of the Act.

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**11. May State agencies consider the changes to exceptions from the time limit a mass change?**

No. Changes to exception criteria are not considered a mass change under 7 CFR 273.12(e). State agencies must follow normal notice requirements for time-limited participants.

**12. Must State agencies modify their Notice of Adverse Action (NOAA) to include the modified exception criteria?**

State agencies must send a NOAA prior to reducing or terminating a household's benefits, such as when a time-limited participant accrues three countable months and is no longer eligible for SNAP. Per 7 CFR 273.11(c)(4)(ii) and 273.13(a)(2), the NOAA must explain, at minimum, that the case will be closed because the individual failed to fulfill the work requirement and the action the individual can take to regain eligibility, including either fulfilling the work requirement or meeting an exception. State agencies must update their NOAA to ensure they provide accurate information to individuals on how they can regain eligibility.

**B. Changes to Waiver Criteria**

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**13. Are there changes to the information State agencies must provide to request waivers of the time limit?**

Yes. The OBBB amends the criteria under which the Secretary may approve a State agency request to waive the time limit. Per Section 6(o)(4)(A) of the Act, to qualify for a waiver, State agencies must demonstrate that the requested areas have unemployment rates of over 10 percent, or in Alaska and Hawaii, that unemployment rate is at or over 1.5 times the national unemployment rate. The OBBB does not change the process for submitting waiver requests.

**14. May reservation areas continue to qualify for waivers of the time limit?**

Possibly. State agencies may continue to request waivers of the time limit for reservation areas if the unemployment rates meet the statutory criteria, as described in Question 13. Please note, the OBBB also excepts "Indians", "Urban Indians", and "California Indians" from the time limit. State agencies may continue to request waivers of the time limit for reservation areas since some people that live in reservation areas may not meet these exceptions.

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**15. How must State agencies screen for exceptions from the time limit when a waiver of the time limit ends?**

In general, State agencies should screen individuals even when a waiver is in place. State agencies must also measure the three-year period and track time-limited participants on a continuous basis, even in areas under a waiver. When a waiver ends, State agencies must ensure individuals who are subject to the time limit are notified of the applicable work requirements and begin applying the time limit.

State agencies must follow screening procedures at 7 CFR 273.24(k) for individuals residing in a previously waived area who may be newly subject to the time limit due to changes in exceptions.

**16. When are State agencies required to send the consolidated work notice and provide the oral explanation to time-limited participants living in previously waived areas?**

The OBBB did not change the notice requirements. State agencies must provide a consolidated written notice and an oral explanation describing the applicable work requirements for each household member at certification, recertification, and whenever a household member becomes subject to the work requirements per 7 CFR 273.7(c)(1)(ii).

When a waiver of the time limit ends, FNA strongly recommends sending additional notices to remind time-limited participants of the requirements. If a State agency has not provided the consolidated work notice or oral explanation to households while the waiver was in effect, it is required to provide such notices, per 7 CFR 273.7(c)(1)(iii), to anyone now subject to the work requirements due to the expiration of the waiver.

**C. Good Faith Exemptions for Alaska and Hawaii**

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**17. What is the difference between the waiver criterion for Alaska and Hawaii and the good faith exemptions for Alaska and Hawaii?**

The waiver criteria for Alaska and Hawaii allow the Secretary to approve waivers of geographic areas of the State that have unemployment rates at or above 1.5 times the national average per section 10102(b) of the OBBB. This waiver covers individuals residing in a specific geographic area. The State agency must submit a request including supporting data demonstrating unemployment rates meet the threshold in the given areas and receive FNA approval to waive the time limit.

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The new and temporary good faith exemptions for Alaska and Hawaii allow the Secretary to approve the State agency to exempt individuals from the time limit if the State agency is making a good faith effort to move the individual into compliance with the work requirement per Section 10102(c) of the OBBB. These exemptions expire December 31, 2028. The State agency must submit a request and receive approval to use such good faith exemptions. For further information, please see the October 3, 2025, memorandum, [Supplemental Nutrition Assistance Program Provisions of the One Big Beautiful Bill Act of 2025 – ABAWD Waivers - Implementation Memorandum.](#)

**18. Are good faith exemptions for Alaska and Hawaii the same as discretionary exemptions?**

No. Discretionary exemptions were not changed by the OBBB. Each discretionary exemption allows a State agency to extend eligibility to one time-limited participants for one month per Section 6(o)(6) of the Act.

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