



**Office of Temporary
and Disability Assistance**

SNAP Briefing

Federal Work Requirements/Time Limits from HR1

October 16, 2025

Impact of New Federal SNAP Guidance

The legislation signed by President Trump on July 4, 2025 makes significant changes to the work requirements for so-called Able-Bodied Adults Without Dependents, or ABAWDs, that take effect next month, November 2025.

- Under the law, individuals identified as ABAWD can receive SNAP benefits for only 3 months in a three-year period if they do not meet certain work requirements.
- Additionally, the population subject to the ABAWD time limit is expanding, and the federal rules on when a state can waive those time limits have become more restrictive.

Impact of New Federal SNAP Guidance

- On October 3rd, the U.S. Department of Agriculture notified New York that our current waiver of the ABAWD time limit requirements, which was set to continue through February 2026, will now end early, effective November 2, 2025.
- Beginning November 3rd, individuals already considered an ABAWD before the new law, who were covered by the waiver, will once again be subject to the ABAWD time limit and work requirement rules effective November 3rd.
- This early termination of the waiver will immediately impact more than 200,000 current SNAP recipients in New York State.

Impact of New Federal SNAP Guidance

- Local social services districts will be notifying all individuals currently identified as ABAWDs as soon as possible.
- In addition, new applicants for SNAP will be screened to determine if they are subject to the ABAWD work requirements, and if so need to comply to retain SNAP for more than 3 months.
- Individuals currently in receipt of SNAP but not identified as an ABAWD under prior rules, will be screened at recertification to determine if they are now subject to the ABAWD requirements.

Impact of New Federal SNAP Guidance

- The notices individuals will receive will explain the change, outline the requirements, and offer recipients help to meet them.
- Local social services districts will also be reviewing any new information a recipient provides that might exempt someone from the ABAWD rules.

Expanded ABAWD Population

- The ABAWD age range now covers individuals 18 through 64, up from the previous age limit of 54.
- Caretakers of children aged 14 to 17 (without a younger child) are now subject to the time limit, unless another exemption applies.
- Several former exemptions are no longer allowed: individuals who are homeless, veterans, and those aging out of foster care.
- There is a new exemption for members of federally recognized Indian tribes.

Keeping SNAP Benefits

- To remain eligible for SNAP benefits beyond 3 months, ABAWDs must engage in qualifying work or activities for at least 80 hours per month. This participation can include:
 - Employment,
 - Work or training programs,
 - Job search or job readiness activities, or
 - Participation in approved volunteer or community service programs.
- Options exist that require fewer hours of participation.

Keeping SNAP Benefits

- Employment resulting in gross **weekly** pay of at least \$217.50 exempts an individual from the time limit. (30 hours * federal minimum wage of \$7.25)
- Participation in a volunteer activity requires less than 20 hours per week. Participants meet the work requirement so long as the hourly participation is equivalent to the individual's SNAP benefit divided by the State minimum wage
 - For example, if an individual receives a monthly SNAP benefit of \$298, in New York City, Nassau, Suffolk, and Westchester counties, that equates to about 18 hours per month of required participation and about 19 hours a month in the rest of the state where the State minimum wage is lower.

Remaining Eligible for SNAP

- If someone loses benefits for not meeting the requirement, they can regain eligibility by re-engaging in a one of the following:
 - Participating in a qualifying activity for 80 hours in a month
 - Applicant prospective compliance- Eligibility is re-established if an applicant ABAWD can verify for the district that they will meet the ABAWD work requirements within the 30 calendar days following application.
 - Recipient prospective compliance - A recipient who has not met the ABAWD requirement for three countable months, but who is able to provide proof before the end of the month of closure that they will meet the ABAWD work requirements in the next benefit month.

Helping SNAP Recipients Keep Benefits

- We understand these federal changes come with little notice and will create real challenges for some individuals receiving SNAP benefits.
- Many individuals who have relied on consistent SNAP access will now have to meet the new requirements or provide documentation that they qualify for an exemption.
- Our goal is to make sure individuals can enter employment and that no one loses benefits simply because they didn't understand the new rules or didn't know where to turn for help.

Questions/Discussion



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