



The SNAP 3-Month Time Limit (ABAWD Work Rules)

A Guide for Community Organizations

Created by the Massachusetts Law Reform Institute, updated April 11, 2025.

This guide provides an overview of the SNAP 3-month time limit - also called the “ABAWD Work Rules.” Use the arrow > on the left hand side to toggle through each question below to learn more about the rules and how to protect vulnerable adults from termination.

Throughout this guide we refer to these rules as the “ABAWD Work Rules” or the “Work Rules” because that is the term DTA uses in letters sent to clients about the time limit.

The Time Limit’s History & Harm

Massachusetts is required to implement a federal 3-month SNAP time limit for certain SNAP recipients who the Department of Transitional Assistance (DTA) identifies as “Able-Bodied Adults Without Dependents” (ABAWDs).

History

- The ABAWD Work Rules were created by Congress in the 1996 Welfare Reform Act. Since then, thousands of Massachusetts adults have been terminated from SNAP after three months - unless they were able to document an exemption or meet the strict work rules.

- Between 2016 and 2019 alone, approximately 35,000 Massachusetts residents lost SNAP due to the 3-month time limit.
- In the Fiscal Responsibility Act of 2023, Congress - for the first time since 1996 - expanded the time limit to include adults 50-54 (and added some positive exemptions for veterans, former foster youth, and unhoused individuals).
- During the COVID-19 pandemic, Congress suspended the ABAWD Work Rules nationwide. Since then, states have been re-implementing the rules based on state-specific timelines.
- **DTA will resume implementing the ABAWD Work Rules on May 1, 2025.** August 1, 2025 (three months later) is the earliest an ABAWD's SNAP benefits could be terminated.

Harm

The 3-month time limit is a [punitive, short-sighted, and ineffective federal rule](#). Work requirements - the origins of which are directly linked to [racist and misogynist myths](#) about the deservingness of public benefit recipients - ignore the systemic barriers that make it difficult for low-income adults to get and keep jobs that pay a living wage, and only serve to push people deeper into poverty.

DTA's reinstatement of the federal ABAWD Work Rules will cause vulnerable and extremely low-income adults to lose SNAP, worsening their risk of food insecurity and economic instability. Many ABAWDs are extremely low-income, have limited education, or face significant barriers in the labor market connecting to reliable, consistent work. ABAWDs also often get SNAP with other people, including spouses, older parents, and adult children. If they are terminated, food security is threatened for the entire household. For these reasons, it is crucial to determine whether ABAWDs are exempt from or able to meet the Work Rules to keep SNAP.

How DTA Determines An Adult Is An ABAWD

An ABAWD is an adult between the ages of 18 and 55 who, based on a screening from DTA, is not [exempt](#) from the Work Rules. Many adults ages 18 through 54 do not have to meet the ABAWD Work Rules.

Under federal law, **DTA SNAP workers must screen SNAP recipients for *all* exemptions before starting the 3 month clock.**

DTA must screen households at specific time periods such as the SNAP application and Recertification interview. During the screening, a SNAP worker must thoroughly review *all* exemptions for every household member aged 18 to 54 who may be subject to the Work Rules. This conversation happens during the interview, either over the phone or in person, with the head of the household (the person whose name is on the case). If an adult qualifies for more than one exemption, DTA must apply the one that lasts the longest.

In many cases, DTA has information to automatically exempt the adult. For example, age, if an adult gets a disability benefit like SSI or EAEDC, or is in a SNAP case with children under 18. DTA also automatically exempts people who live in certain areas of Massachusetts with elevated rates of unemployment that are waived from the Work Rules. [See here](#) for a list of areas that are geographically waived.

Do not assume an adult SNAP recipient has to meet the rules - check first to see if DTA sent them a [notice](#) about the ABAWD Work Rules.

If DTA determined an adult must meet the ABAWD Work Rules, here is what you need to know:

- Starting May 1, an ABAWD can only get 3 *full* months of SNAP until January 1, 2027 - unless they tell DTA about an exemption or meet certain hours in [qualifying work activities](#).
- Many adults who are told they have to meet the ABAWD Work Rules are actually exempt! DTA may make mistakes when doing the screening, or the adult's circumstances may change, making them exempt. [Follow our guide](#) to check for exemptions.
- DTA will send notices telling the ABAWD about exemptions and what they need to do to keep SNAP after they have received one, two and three full months of SNAP without having met an exemption or the Work Rules. During the third full month, DTA will send a termination notice. MLRI will update this Guide this summer with information about ABAWD terminations.

ABAWD Notices

DTA mails notices to SNAP recipients [it determined](#) are subject to the ABAWD Work Rules. If a SNAP recipient was sent a notice from DTA about ABAWD Work Rules, [check below to see if they are exempt](#) or, if not, how they can [meet the Work Rules](#).

Remember: If DTA sent your client a notice stating they must meet the ABAWD Work Rules, they may be exempt! The SNAP worker could have missed something, or the adult's circumstances may have changed.

Initial ABAWD notice: If DTA determines an adult must meet the ABAWD Work Rules, DTA will mail that household a notice with the title *"SNAP and Work: Rules You Must Follow."* ([click here to see a sample](#)). **DTA will begin mailing this notice around April 18th-21st.**

This notice includes:

- The name of the adult(s) who must meet the ABAWD Work Rules
- A description of the ABAWD Work Rules
 - Note this notice will also include information about the General Work Rules. These are different rules than the ABAWD Work Rules. The General Work Rules require certain adults on SNAP to follow rules about reducing hours, quitting a job, or job offers.
- A list of exemptions (detailed in the [section below](#))
- The date the adult needs to begin meeting the rules (or tell DTA they are exempt) to keep SNAP for more than 3 months.

Notices after the ABAWD receives their first and second months of SNAP: DTA will send a notice for each month an ABAWD is not exempt from or meeting the Work Rules.

- [Click here](#) to see the notice DTA sends the first month, titled *"You Will Lose SNAP in 2 Months If You Do Not Act"*
- [Click here](#) to see the notice sent the second month, titled *"You Will Lose SNAP in 1 Month If You Do Not Act."*

Termination notice: After the ABAWD receives two full months of SNAP - unless the ABAWD is exempt from or meeting the Work Rules - DTA will send a [closing notice](#) titled “*You Will Lose SNAP If You Do Not Act,*” explaining that benefits will be terminated unless the ABAWD is exempt from or meeting the work rules. DTA must mail the termination notice at least 10 days before SNAP benefits end. No ABAWD can be terminated due to the Work Rules before August 1, 2025 (3 months after DTA re-starts the time limit on May 1).

If you need help finding notices that have been sent to your client on DTA Connect, [click here](#).

Example: Nina is 53 years old and lives with her 20 year old daughter Serena who is enrolled full time at Bunker Hill Community College. Nina’s Recertification interview is in May. During the interview, the SNAP worker screens Nina for all [exemptions](#). They also ask Nina questions to assess all exemptions for Serena. DTA exempts Serena from meeting the Work Rules because she is a SNAP-eligible student.

Nina is working 10 hours a week, earning \$15 per hour (minimum wage) as a cashier at a grocery store, and is taking one class a semester to try to get her nursing degree. Nina does not qualify for any exemptions, and she is not currently meeting the Work Rules. After the interview, DTA sends the family a *SNAP and Work* notice explaining that Nina needs to meet the General Work Rules and the ABAWD Work Rules.

Exemptions

If, after the [screening](#), DTA sent your client a notice stating they must meet the ABAWD Work Rules, it is possible they should be exempt. The chart below includes all of the exemptions from the ABAWD Work Rules, and sample questions to ask when you discuss with the client.

Exemption Categories	Specific Exemption	Sample Questions to Ask When Discussing With Client
<i>Age and Family Status</i>	Under 18 or 55 or older	DTA automatically applies based on date of birth.
	In a household with a child under 18 years old	Are you living with a child under 18? If yes, assess if the child should be added to the SNAP household (check household composition rules). The adult is exempt even if the child is not eligible for SNAP.
	Caring for a disabled person or child under 6 years old, even if not living together	Do you take care of an adult with disabilities, or a child under 6? You don't need to be related to them, live with them, or provide care full-time.
<i>Housing Situation</i>	Homeless	Do you have a regular place to sleep at night? Are you staying with friends or family, or couch surfing? Are you staying at a shelter?

	At imminent risk of homelessness	Is your housing stable? Are you at risk of being kicked out soon, or being evicted?
<i>Employment and Income</i>	Earning \$217.50/week or more (working at least 14.5 hours/week at \$15/hour - the current minimum wage in MA) Or, if earning less than the minimum wage, working 30 or more hours/week.	Are you currently working? How much do you make an hour, and how many hours do you work a week?
	Applied for or getting unemployment benefits	If you're not currently working, have you applied for or are you getting unemployment benefits?
<i>Education and Training</i>	In any recognized school, training program, or college program (enrolled at least half time)	Are you enrolled in school? For example, are you in high school, college, or other education and training program? If so, are you a full time student? If not, how many classes are you taking? <i>*Note: Before the ABAWD rules kick in, some students in post secondary</i>

		programs must <u>meet the SNAP student rules</u> to qualify for SNAP.
Health	Pregnant	Are you pregnant? It does not matter how far along you are.
	Has a hard time working or can't work at least 20 hours/week due to short or long term health reasons (mental or physical) that make it hard to get or keep a job. <i>Note: DTA and the SNAP rules use the term "unfit for work," but that is not how people think about their health.</i>	Do you have any health issues, such as mental health and/or physical conditions, that make it hard to work or reduce your ability to work? These can be health reasons that are short-term or longer-term.
	Getting a disability benefit or payment (including SSI, SSDI, EAEDC, worker's compensation, short term disability, etc)	Do you get any disability benefits like Social Security Disability, SSI (Supplemental Security Income), worker's compensation, or other disability benefits? <i>*Note: If the client has no income and has a short or long term disability,</i>

		explore if eligible for EAEDC . Flier from MLRI on EAEDC here .
	MassAbility participant (formerly Mass Rehab Commission)	Do you get services from MassAbility? <i>*Note: MassAbility provides a range of services to adults who have physical and/or mental impairments that impact their ability to support themselves. This can include post secondary education and income supports.</i>
	In substance use treatment program	Are you in a program or in treatment for alcohol or drug use? (does not need to be a daily program)
Veteran	Served in any branch, regardless of discharge	Have you ever served in any branch of the military? For example, the Army, Navy, Marines, Coast Guard, Air Force, the Reserves, or the National Guard? It does not matter what your discharge status was, or if you were ever deployed. If not - have you ever served as a commissioned officer of the Public Health Service, ESSA, or NOAA?

<i>Formerly in Foster Care</i>	Was in foster care on or after they turned 18 years old and are currently under 25 years old	<p>[if currently under 25] Were you in foster care when you turned 18, or after you turned 18?</p> <p>[if lived in MA when turned 18] Were you in foster care when you turned 18? Was DCF legally responsible for you, even if you were not in a foster care home?</p> <p>[if lived outside of MA when turned 18] Were you in foster care or child protective services in that state?</p>
<i>Domestic Violence</i>	Domestic violence/intimate partner violence with safety concerns that impact ability to work	<p>Has a domestic violence or safety situation made it difficult for you to work?</p> <p><i>*Note: DTA has DV specialists in each local DTA office. Contact info here.</i></p>

Reporting Exemptions to DTA

Tell DTA as soon as possible about any exemption from the Work Rules:

- **Call** the DTA Assistance line at (877) 382-2363 (see [below](#) on how to get help over the phone)
- **Go to a [local DTA office](#)** to speak with a SNAP worker or scan a document into your case record.
- **Send a written, signed statement** (handwritten note is fine) explaining the exemption:

- Online on DTAConnect.com or on the DTA Connect mobile app.
- By mail: DTA Document Processing Center, P.O. Box 4406, Taunton, MA 02780-0420
- By fax: (617) 887-8765

If the client is exempt based on income, send DTA proof of the income by taking the steps above. Otherwise, DTA will follow up if they need additional information from the client.

DTA does not currently send a follow-up notice when it exempts an ABAWD who was previously told they needed to meet the Work Rules. If you cannot get confirmation from DTA that DTA updated the ABAWD's case, contact info@masslegalservices.org.

For more information on how to contact DTA, see [DTA's Mass.gov page here](#).

Example: Nina was previously working 10 hours a week, earning \$15 per hour (minimum wage) as a cashier at a grocery store, but her hours recently increased to 18 hours a week and she now earns \$270 per week. Nina is now exempt from meeting the ABAWD Work Rules because her income is higher than \$217.50/week. Nina verifies her income and the number of hours worked to DTA by submitting pay stubs online at DTAConnect.com.

DTA will not send Nina a notice confirming that she is now exempt from meeting the Work Rules, but DTA will send a notice with the new SNAP benefit calculation.

What ABAWDs Must Do to Keep SNAP

An adult who is not exempt must meet one of the below to keep SNAP for more than 3 months:

Ways to Meet the Work Rules	How to Meet the Work Rules	Tips to Find Work, Training, or Volunteer Opportunities
<i>Employment</i>	<p>Work at least 20 hours/week on average, or 80 hours/month.</p> <p><i>*Can combine with E&T, see below, for a total of 20 hours/week. And, see exemptions based on income.</i></p> <p>This includes self-employment and in-kind or unpaid work. For example, an unpaid internship or apprenticeship, doing unpaid work in exchange for rent (such as building maintenance for a landlord), unpaid work for a faith-based organization (such as a church maintenance worker), etc.</p>	<p>ABAWDs can connect with job search resources at a local MassHire Career Center. Office locations can be found here or by calling (888) 483-0255.</p>
<i>DTA Employment and Training Program</i>	<p>Participate in a DTA SNAP Path to Work Employment and Training (E&T) program for at least 20 hours/week on average.</p> <p><i>*Can combine with hours worked, see above, for a total of 20 hours/week.</i></p>	<p>For a full list of programs, click here or call the SNAP Path to Work Line at (888) 483-0255.</p> <ul style="list-style-type: none"> • Programs include virtual programs, getting a GED or English for language learners, certificate programs at certain

		<p>community colleges, apprenticeships and more. DTA covers the costs of the educational program, including transportation reimbursement.</p> <p>Connect with the Work Participant Program by visiting a local MassHire Career Center. Find office locations here or call (888) 483-0255.</p>
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<p><i>Volunteer Work/ Community Service</i></p>	<p>Do volunteer work for a nonprofit organization for a specific number of hours each month. Number of hours per month is the amount of the ABAWD's SNAP benefit divided by \$15 (the current MA minimum wage). DTA notices state the number of hours needed.</p> <p><i>*Cannot combine with work or training hours.</i></p> <ul style="list-style-type: none"> • <i>Example: Patrick begins volunteering at a food pantry. He gets \$292/month in SNAP. Patrick needs to volunteer 19 hours/month to meet the Work Rules and stay on SNAP for more than 3 months ($\\$292 \div \\$15 = 19$).</i> 	<p>For a list of community service providers approved by DTA, click here and use the search engine titled, <i>ABAWD Volunteer Site</i>.</p> <p>ABAWDs can arrange their own community service/volunteer placement, or ask DTA for a referral to a SNAP Community Service Program placement. To do either, call the SNAP Path to Work Line at (888) 483-0255.</p> <p><i>Note: Nonprofits that serve children, older adults, or persons with disabilities will require CORI and SORI checks for all staff and volunteers. The organization should cover the costs of the CORI check.</i></p>
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Example: The grocery store that Nina works at closes and she is let go. DTA sends Nina a *SNAP and Work [notice](#)* explaining that she must meet the Work Rules. Nina calls the SNAP Path to Work Line at (888) 483-0255 and decides to enroll in a DTA employment and training program to advance her career goals. Once Nina begins participating 20 hours/week, DTA lists her as meeting the ABAWD Work Rules and she avoids termination.

Reminder: If your client is currently subject to the Work Rules, it is important to reevaluate exemptions regularly! Life factors that determine exemption eligibility may change with time. [See here](#) for a list of exemptions. If at any point your client becomes exempt, [tell DTA right away](#). If you or your client are having trouble connecting with DTA, [see here](#).

How to Prove an ABAWD is Meeting the ABAWD Work Rules

To prove to DTA that your client is meeting the Work Rules, they will need to follow certain steps depending on how they are meeting the ABAWD Work Rules.

Ways to Meet the Work Rules	What to Send to DTA
<i>Employment</i>	For paid work: Verify income and the number of hours worked to DTA by submitting proof, such as pay stubs, a letter from the employer, or other proofs. For In-Kind/Unpaid Work: Send DTA proof such as a letter with a description of the arrangement and the number of hours the client worked.
<i>DTA Employment and Training Program</i>	Once connected to a program, fill out page one of the ABAWD Training Program Information Request form to authorize the release of training/education program information (like hours participated in the program per week) to DTA. Program staff must fill out page two of the form before it is sent to DTA.
<i>Volunteer/Community Service</i>	Once connected to community service, fill out a DTA participation report. MLRI will add DTA's procedures for

	verifying community service soon. Call (888) 483-0255 for help with volunteer sites.
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Send documents to DTA:

- Online: Go to DTAConnect.com or download the DTA Connect mobile app
- By mail: DTA Document Processing Center, P.O. Box 4406, Taunton, MA 02780-0420
- By fax: 617-887-8765
- In person: DTA local office information [here](#).

Next Steps If SNAP is Terminated due to the ABAWD Work Rules

There will not be any SNAP terminations under the MA ABAWD Work Rules prior to August 1, 2025 (3 months after DTA re-starts the time limit on May 1).

MLRI will update this Guide this summer with information on good reasons ABAWD may not be able to meet the work rules, and what to do if an ABAWD is at risk of termination or has been terminated.

How to See DTA Notices or Reach DTA

To see DTA notices, log onto your client's DTA Connect account. You can do this when meeting with your client, or if you have their explicit written permission to use DTAConnect to see their SNAP case information. Or, ask your client to send you photos of DTA notices they received in the mail.

DTA notices for the prior 12 months are posted on the DTA Connect [online portal](#) and DTA Connect mobile app. ([See here](#) for guidelines for organizations helping clients with their SNAP case, and [here](#) for tips on how to navigate logging onto and using DTA Connect). SNAP Outreach Partners can also see all client notices through their special DTA Provider Portal.

Need help reaching DTA? It continues to be extremely difficult to reach a SNAP worker on the statewide DTA Assistance Line (877-382-2363). [Click here for advocacy tips](#) if you can't get through the Assistance Line.

More Resources & MLRI Story Collection

- [MLRI Know Your Rights flier for ABAWDs](#)
- [DTA's Mass.gov page on work rules](#)
- **We want to hear from you and your clients!** Please share [this form](#) with your clients to help us understand how ABAWD work rules are impacting their lives, and support advocacy against expanded work rules.
- **Join the statewide SNAP Coalition** to stay up to date on SNAP and ways you can take action to protect and improve SNAP. The coalition meets virtually on the fourth Tuesday of every month. Email Vicky Negus - vnegus@mlri.org - or Pat Baker - pbaker@mlri.org to join.