

DATE: December 22, 2025

SUBJECT: Supplemental Nutrition Assistance Program (SNAP) – Fiscal Year 2026
Allocations of Discretionary Exemptions for Time-Limited Participants (Able-Bodied Adults Without Dependents)– Not Adjusted for Carryover

TO: All SNAP State Agencies
All Regions

Able-bodied adults without dependents (ABAWDs), referred to as time-limited participants, may only participate in SNAP for 3 months in any 36-month period, unless the individual fulfills certain work requirements or is otherwise exempt from the time limit. State agencies also receive a limited number of discretionary exemptions that they can use to extend eligibility for time-limited participants per Section 6(o)(6) of the Food and Nutrition Act of 2008 (the Act). Each discretionary exemption extends eligibility to one time-limited participant for one month.

This memorandum provides estimates of the number of new discretionary exemptions each State agency has earned for FY 2026 (column 2 of the attached table). The number of discretionary exemptions each State agency earns is based on eight percent of the State's estimated number of covered individuals, per section 6(o)(6)(A)(ii) of the Act. State agencies do not earn discretionary exemptions for areas that operated under a waiver of the ABAWD time limit as of July 1, 2025.

Limitations on Carrying Over Unused Discretionary Exemptions

The Fiscal Responsibility Act of 2023 limits State agencies' ability to carry over of discretionary exemptions. Therefore, as of FY 2026 (beginning October 1, 2025), State agencies may only carry over unused exemptions earned for the previous fiscal year (FY 2025).

To help estimate the maximum number of carryover exemptions, the attached table includes the number of new earned exemptions for FY 2025 (column 3).¹ These figures do **not** account for the number of discretionary exemptions each State agency used during FY 2025. This may help indicate the maximum number of exemptions available for carryover into FY 2026; the actual carryover for FY 2026 will depend on the number of discretionary exemptions the State agency used in FY 2025.

¹ These figures were last published these figures in the May 15, 2025, memorandum, "Fiscal Year 2025 Allocations of Discretionary Exemptions for Able-Bodied Adults Without Dependents – Time Limited Participants."

For FY 2026, a State agency may use the discretionary exemptions newly earned for FY 2026, as well as any unused discretionary exemptions earned for FY 2025. For example:

1. If the State agency did not use any discretionary exemptions in FY 2025, it would carry over all discretionary exemptions newly earned in FY 2025. The State agency would lose all other remaining discretionary exemptions earned in prior fiscal years.
2. If the State agency used its entire allotment of discretionary exemptions in FY 2025 (including those newly earned in FY 2025 and carried over from prior fiscal years), then it would have zero discretionary exemptions available for carryover into FY 2026.

State agencies must track their usage of discretionary exemptions on an ongoing basis and document their application in case records prior to monthly Quality Control sample selections. State agencies must report final figures for FY 2025 via the FNS-583 form by November 15, 2025, 45 days after the end of the reporting period. Once required data on discretionary exemptions used in FY 2025 and changes in caseload size are available, FNS will issue updated discretionary exemptions totals for each State agency for FY 2026.

State agencies with questions should contact their respective Regional Office representatives.

Sincerely,

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Ronald Ward
Acting Associate Administrator
Supplemental Nutrition Assistance Program
Food and Nutrition Service
U.S. Department of Agriculture

State	New Discretionary Exemptions Earned for FY 2026 (Do Not Account for Carryover or Include Caseload Adjustments)	New Discretionary Exemptions Earned for FY 2025² (Do Not Account for Usage in FY 2025)
Alabama	24,027	24,333
Alaska	1,080	67
Arizona	10,043	10,266
Arkansas	6,643	6,765
California	0	0
Colorado	8,110	7,225
Connecticut	7,925	1,925
Delaware	1,179	0
District of Columbia	0	0
Florida	82,580	78,819
Georgia	38,844	36,731
Guam	0	0
Hawaii	6,037	5,235
Idaho	3,313	3,197
Illinois	0	0
Indiana	15,005	15,194

² Last published on May 15, 2025, in the “Fiscal Year 2025 Allocations of Discretionary Exemptions for Able-Bodied Adults Without Dependents – Time Limited Participants” memo.

State	New Discretionary Exemptions Earned for FY 2026 (Do Not Account for Carryover or Include Caseload Adjustments)	New Discretionary Exemptions Earned for FY 2025² (Do Not Account for Usage in FY 2025)
Iowa	5,212	5,118
Kansas	3,459	3,459
Kentucky	2,856	7,347
Louisiana	28,211	14,810
Maine	5,664	5,298
Maryland	13,368	6,982
Massachusetts	24,231	15,018
Michigan	9,305	4,809
Minnesota	10,069	10,080
Mississippi	11,612	12,301
Missouri	23,971	23,737
Montana	2,480	2,450
Nebraska	3,378	3,458
Nevada	0	0
New Hampshire	747	755
New Jersey	343	1,045

State	New Discretionary Exemptions Earned for FY 2026 (Do Not Account for Carryover or Include Caseload Adjustments)	New Discretionary Exemptions Earned for FY 2025² (Do Not Account for Usage in FY 2025)
New Mexico ³	3,832	0
New York	863	0
North Carolina	39,644	39,119
North Dakota ⁴	1,529	1,423
Ohio	36,601	27,025
Oklahoma	20,710	20,278
Oregon	15,512	14,927
Pennsylvania	399	8,989
Rhode Island	1,906	2,274
South Carolina	12,366	11,873
South Dakota	1,251	1,235
Tennessee	28,091	28,453
Texas	81,702	74,840
Utah	2,813	2,644
Vermont	2,581	2,674

³ New Mexico overused discretionary exemptions in the first and second quarters of FY 2009. The State agency has had waivers since that time and therefore has not earned any exemptions since that time. The State agency cannot use discretionary exemptions until its negative balance is eliminated.

⁴ North Dakota misreported use of discretionary exemptions leaving the State with a negative balance of exemptions for FY2025. The State agency cannot use discretionary exemptions until its negative balance is eliminated.

State	New Discretionary Exemptions Earned for FY 2026 (Do Not Account for Carryover or Include Caseload Adjustments)	New Discretionary Exemptions Earned for FY 2025² (Do Not Account for Usage in FY 2025)
Virginia	30,444	26,735
Virgin Islands	0	0
Washington	7,473	7,326
West Virginia	13,255	13,505
Wisconsin	14,120	11,509
Wyoming	1,015	1,053