



Food and Nutrition Service

U.S. DEPARTMENT OF AGRICULTURE

DATE: November 14, 2025

SUBJECT: Supplemental Nutrition Assistance Program (SNAP) Questions and Answers on Quality Control (QC) Variance Exclusion

TO: All SNAP State Agencies
All Regions

The Food and Nutrition Service (FNS) has issued a number of guidance documents on the implementation of SNAP related provisions in H.R. 1, the One Big Beautiful Bill Act of 2025 (OBBA). This memo provides answers to follow-up questions submitted by State agencies on the variance exclusion period for implementation of Section 10102: Modifications to SNAP Work Requirements for Able-Bodied Adults and Section 10103: Availability of Standard Utility Allowances Based on Receipt of Energy Assistance.

A variance in SNAP QC represents a difference in an element of a basic program requirement or basis of issuance in which the information verified by the QC worker differs from the information used to certify the household. SNAP regulations at 7 CFR 275.12(d)(2)(vii) allow for a variance exclusion period during which States can exclude from the error rate any variances related to new SNAP regulations or changes in Federal law within the first 120 days of the required implementation date.

State agencies with questions about this memo or other aspects of implementation, including requests for technical assistance, should contact their respective FNS regional office.

Sincerely,

SASHA
GERSTEN-PAAL

Digitally signed by
SASHA GERSTEN-PAAL
Date: 2025.11.14
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For Ronald Ward
Acting Associate Administrator
Supplemental Nutrition Assistance Program
Food and Nutrition Service

Attachment

**Questions Regarding Sections 10102 and 10103
of H.R. 1, the One Big Beautiful Bill Act of 2025 (OBBB)**

- 1. What is the required implementation date for OBBB provisions in Sections 10102 and 10103 regarding the able-bodied adults without dependents (ABAWDs) and the treatment of energy assistance payments? Is the required date the enactment of OBBB (July 4, 2025) or the date the State can implement the provisions and notify staff?**

The required implementation date is the enactment of OBBB, July 4, 2025.

- 2. When does the variance exclusion period apply?**

The variance exclusion period ended November 1, 2025, which is 120 days from July 4, 2025.

- 3. If a State implemented Sections 10102 and 10103, including informing staff of the policy change, after August 29, 2025, but before November 1, 2025, on what date would the hold harmless variance exclusion period begin?**

Regardless of the implementation date chosen by the State, the variance exclusion period for implementing ABAWD exemption changes in Section 10102 and all provisions in Section 10103 of the OBBB ended November 1, 2025.

- 4. Can FNS extend the 120-day variance exclusion period?**

No, the law limits the variance exclusion period to 120 days. Per Section 16(c)(3)(A) of the Food and Nutrition Act of 2008, as amended, and 7 CFR 275.12(d)(2)(vii), certification errors resulting from the application of a new change in Federal law that occurs during the first 120 days from the required implementation date is excluded from the Quality Control (QC) error analysis. The OBBB did not address QC variance exclusions, therefore existing SNAP statutory and regulatory requirements apply.