

Timeline – July 2025

- **July 4, 2025** – President signs [H.R. 1](#) into law. A 120-day Quality Control (QC) hold harmless period begins for implementation of five SNAP provisions:
 - **Sec. 10101**: Re-evaluation of thrifty food plan
 - **Sec. 10102**: Modifications to SNAP work requirements for able-bodied adults
 - **Sec. 10103**: Availability of standard utility allowances based on receipt of energy assistance
 - **Sec. 10104**: Restrictions on internet expenses
 - **Sec. 10108**: Alien SNAP eligibility

Timeline – August/September 2025

- **August 2025**

- **Aug. 15, 2025** – FNS issues [memo](#) to state SNAP agencies on calculating Standard Utility Allowances (Sec. 10103) following passage of H.R. 1
- **Aug. 29, 2025** – FNS issues [memo](#) on treatment of certain energy assistance program payments (Sec. 10103) for determining benefit levels.

- **September 2025**

- **Sept. 4, 2025** – FNS issues [memo](#) summarizing SNAP provisions in H.R. 1 and confirms states will be held harmless for QC purposes for 120 days from implementation (ending **Nov. 1, 2025**). Memo promises additional detailed guidance by Sept. 30, which was not issued.

Timeline – October 2025

- **Oct. 1, 2025** – Federal government shutdown begins, impacting FNS operations.
- **Oct. 3, 2025** – FNS issues two memos on changes to ABAWD work requirements (Sec. 10102), including [exemptions](#) and [waivers](#).
- **Oct. 10, 2025** – FNS instructs state SNAP agencies not to process SNAP EBT files due to insufficient funds for November benefits.
- **Oct. 24, 2025** – FNS confirms funding for November SNAP benefits will not be provided, citing insufficient funds and need to retain resources for emergencies.
- **Oct. 28, 2025** - 26-state representatives including Democratic state attorneys general, and several Governors file a lawsuit to compel USDA to release SNAP Contingency Funds to states and territories.
- **Oct. 31, 2025** –
 - FNS issues [memo](#) on implementation of Sec. 10108 (alien SNAP eligibility).
 - Two federal judges rule administration must provide November SNAP benefits and set Nov. 3 deadline for compliance plan.

Timeline – November 2025

- **Nov. 1, 2025** – QC hold harmless period ends; states must fully implement H.R. 1 provisions effective July 4.
- **Nov. 4, 2025** – Following court order, FNS [memo](#) instructs states to issue reduced November benefits per FNS allotment tables.
- **Nov. 5, 2025** – FNS [revises](#) Nov. 4 guidance; maximum allotments reduced by 35% (not 50%), meaning benefits are 65% of normal maximums.
- **Nov. 6, 2025** – Federal Court in Rhode Island orders full SNAP benefits for November, not partial.
- **Nov. 7, 2025** – FNS [memo](#) states it is working to implement full November issuances per court order and will make funds available later that day.
- **Nov. 8, 2025** – FNS [memo](#) announces Supreme Court grants USDA an administrative stay, requiring states to continue processing partial issuance files (35% reduction). States that sent full payment files acted without authorization.
- **Nov. 12, 2025** – Federal shutdown ends.
- **Nov. 13, 2025** – FNS [memo](#) advises states that full FY 2026 funding is available; states should proceed with transmission of full December issuance files.
- **Nov. 14, 2025** – FNS [memo](#) clarifies QC variance exclusion period for Sec. 10102 and 10103 ended Nov. 1, 2025, for provisions effective July 4.