

EES Policy No. 25-10-08	RE: ABAWD Changes
Policy Memo	Contact Persons: Elizabeth Ahumada
From: Dr. Carla Whiteside-Hicks, EES Director	KEESM Reference: 2520 , 2521
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Primary DCF Areas Affected: Food Assistance	Where Posted on Web: http://content.dcf.ks.gov/ees/KEESM/Policy_Memo/policy_memo_list.htm

On July 4, 2025, Public Law 119-21, the One Big Beautiful Bill Act of 2025 (OBBB), was signed into law. The law contains several provisions that affect the Food Assistance Program. This memo provides guidance for changes to ABAWD time limit rules.

Changes to exemptions from time-limited assistance for ABAWDs are as follows:

- The upper age limit has been changed to 65 and older.
- Limits the exemption based on responsibility to care for a dependent child to those with a child under 14 years of age.
- Removes exemptions for individuals experiencing homelessness, veterans, and those 24 and younger who aged out of foster care.
- Establishes new exemptions for an “Indian,” “Urban Indian,” or “California Indian,” as defined in the Indian Health Care Improvement Act
 - Indian is defined as:
 - any person who is a member of an Indian tribe
 - Indian tribe is defined as:
 - Any Indian tribe, band, nation, or other organized group or community, including any Alaska Native village or group or regional or village corporation as defined in or established pursuant to the Alaska Native Claims Settlement Act, which is recognized as eligible for the special programs and services provided by the United States to Indians because of their status as Indians.
 - An individual is an Urban Indian if they:
 - Reside in an urban center and meet at least one of the following four criteria:
 1. Regardless of if they live on or near a reservation, is a member of a tribe, band, or other organized group of Indians, including those tribes, bands, or groups terminated since 1940 and those recognized now or in the future by the State in which they reside, or who is a descendant, in the first or second degree of any such member
 2. Is an Eskimo, Aleut, or other Alaska Native,
 3. Is determined to be an Indian for any purpose under regulations promulgated by the Secretary of the Interior; or
 4. Is determined to be an Indian under regulations promulgated by the Secretary of Health and Human Services.
 - Urban center is defined as any community that has a sufficient urban Indian population with unmet health needs to warrant assistance under subchapter IV of the IHICA, as determined by the Secretary of Health and Human Services.

- An individual is a California Indian if they:
 - Are a member of a federally recognized Indian tribe.
 - Are a descendant of an Indian who was residing in California on June 1, 1852, if such descendant:
 1. Is a member of the community served by a local program of the Indian Health Service; and
 2. Is regarded as an Indian by the community in which such descendant lives.
 - Are an Indian who holds trust interests in the public domain, national forest, or reservation allotments in California.
 - Are an Indian of California who is listed on the plans for distribution of the assets of rancherias and reservations located within the State of California under the Act of August 18, 1958, and any descendant of such an Indian.

Implementation Instructions

The KEES eligibility system will apply the new upper age limit when EDBC is run for benefits that will be issued on or after November 1, 2025. All other OBBB-related ABAWD changes will be implemented in KEES in a future KEES release.

Any application, review, interim report, 12-month report, or change processed staff will be required to identify ABAWDs, which are now individuals 18-64 with no children in the home under 14. After identifying an ABAWD, staff must complete ABAWD screening, apply any exemptions, end any exemptions and apply any workarounds needed.

KEES system workarounds include:

- Documentation standard text
- Future tasks set
- Case flag set
- Manual change notice standard text
- Manual no benefit change notice standard text
- Multiple approval notices standard text
- Food Assistance Work Rules sent manually
- Exemption reason of "Care of Incapacitated Household Member" used for Indian, Urban Indian, or California Indian exemption

[E-26 \(English\)](#)

[E-26 \(Spanish\)](#)

Accessible to **Staff** only:

[ABAWD Workaround Desk Aid](#)

[DCF Processing Deadlines](#)

[Food Assistance Work Rules](#) (English)

[Food Assistance Work Rules](#) (Spanish)

[Q&A](#)

ABAWD Screening

At Application, Review, Interim Report, 12-month report, or when a change is reported, cases containing ABAWDs must be screened for current ABAWD exemptions. Staff must follow the cold call

process to contact the client, review the Consolidated Work Requirements (Appendix E-26), and send the Food Assistance Work Rules notice manually. If the attempt to reach the client is unsuccessful at the Interim Report, 12-month report, or when a change is reported, staff must use the information available in the case file to conduct the screening and apply any exemptions for which the client is eligible. If screening is completed at the Interim Report, 12-month report, or when a change is reported, use the following copy and paste journal entry.

Successful contact	<CLIENT NAME> is now considered an ABAWD beginning <MM/YYYY>. Called and reviewed Consolidated Work Rules verbally. Food Assistance Work Rules notification sent manually. ABAWD screening completed – client does not meet any exemptions OR client meets <exemption>.
Unsuccessful contact	<CLIENT NAME> is now considered an ABAWD beginning <MM/YYYY>. Call to review Consolidated Work Rules was unsuccessful. Food Assistance Work Rules notification sent manually. ABAWD screening completed using information available in the case file – client does not meet any exemptions OR client meets <EXEMPTION>.

Individuals previously exempt under any of the three reasons that have been removed will no longer be exempt unless they meet another reason. The client statement is to be used as verification of tribal status. Further verification is only required if the client's statement is determined to be questionable.

Individuals will be considered ABAWDs the month after the month the youngest child in the home turns 14. When the youngest member of a household is a 13-year-old child who will turn 14 before the next Review, Interim Report, or 12-month report, set a future task to create an ABAWD time limit record for the adult(s) in the household, the month the child will turn 14. Instructions for adding the future task are listed on the ABAWD Workaround Desk Aid linked above.

Individuals aged 60 – 64 are considered ABAWDs but are not work registrants. KEESM 2521(1) does not apply to ABAWDs age 60 – 64 since they are not subject to work registrant rules. ABAWD rules will no longer apply to individuals the month they turn 65. **Individuals aged 60 – 64 with a 24-month certification period will now be required to complete an interview at review.**

Notification

A notification will be sent out to all active cases with ABAWDs via mail. The notification will provide updated ABAWD policy information. A KEES journal entry will be added automatically, and the notice will be visible in the Distributed Documents.

- KEES Journal entry - ABAWD Time Limit Rules Mass Notification Update NOA Sent.
- Distributed Documents - ABAWD Time Limit Rules Mass Notification

Until the Food Assistance Work Rules notice is updated in the KEES system, the batch that runs to send these notices will be turned off. **All** ABAWDs must be sent the Food Assistance Work Rules notice manually in addition to their approval or benefits change notice. The Food Assistance Work Rules notice will be printed and mailed from the local office of the staff processing the case.

Examples:

1. Joe, age 56, applies for Food Assistance on November 15th, and the only child in the home is his 17-year-old son. KEES will not identify Joe as an ABAWD because he has a dependent under 18, which meets the current KEES rules. The worker recognizes that there are no

children in the home under 14 and identifies Joe as an ABAWD. The worker screens Joe for ABAWD exemptions, and none are found. Joe is not meeting the 20 hours per week work requirement. ABAWD countable months will be applied for Joe starting December 2025 – February 2026. The worker applies the workarounds for manually tracking ABAWD months by:

- Adding the countable months to the Time Limits page through the come-up month,
- Using the DCF Processing Deadlines, the worker sets a future task to close the case manually for the use of all 3 ABAWD months. The task due date is set for the come-up month available date in January,
- Adding case flag, and
- Adding journal entry using the documentation copy and paste text.

The worker will append the system-generated notice and add the copy and paste text for approval notice. The Food Assistance Work Rules notice is manually sent.

- a. The task is picked up by the worker, and the third countable ABAWD month is added to the Time Limits page. Joe will be discontinued with a Non-Compliance reason of Failure to Provide Social Security Number. The worker will delete the system-generated benefit change notice and generate a V808 using the copy and paste text for manual change.
 - b. The task is picked up by the worker, and the worker notices that the client has recently submitted notification that he is receiving unemployment benefits. Worker verifies Joe applied for unemployment on January 5, 2026, and was approved for unemployment benefits on January 10, 2026. Worker removes countable ABAWD for January 2026 and adds exemption of “Receiving unemployment compensation” to the time limits page for January 2026 through IR.
2. Erin has been receiving Food Assistance since December 2024 and has been an exempt ABAWD due to being a veteran. When her review is processed in November 2025, the worker rescreens and determines she is not meeting any other exemptions, nor is she meeting the 20 hours per week work requirement. Her countable ABAWD months will be December 2025 – February 2026. The worker will add the countable months to the Time Limits page through the come-up month. Since Erin has no dependents in the home, KEES will continue to identify her as an ABAWD. The worker will append the system-generated notice and add the copy and paste text for approval notice. The worker prints the Food Assistance Work Rules notice and manually mails it. The KEES batch will pick up her case and close it for using three countable ABAWD months.
3. Rosa applies for Food Assistance on November 10th and is identified by KEES as an ABAWD. Rosa meets the definition of Indian. The worker adds the exemption reason of “Care of Incapacitated Household Member” to the Time Limits page through the IR month. A journal entry is added to KEES with the documentation copy and paste text and then a case flag set. The worker will append the system-generated notice and add the copy and paste text for approval notice, then manually print and send the Food Assistance Work Rules notice.
4. Jonathan was approved for Food Assistance in November 2025. He is 40 years old and has his 13-year-old child on his case. In February 2026, the child turns 14. The worker picked up the task to update the case based on the child turning 14. The worker must call Jonathan to complete screening for exemptions and verbally review the Consolidated Work Requirements. It is determined that Jonathan is not meeting the work requirement, and he does not meet any exemptions. Since KEES does not identify Jonathan as an ABAWD because there is a child in the home, the worker adds the countable ABAWD months for “did not meet work/training requirement” through come-up month on Time Limits page, adds a journal entry using the documentation copy and paste text, sets a case flag and future task for the date the come-up

month becomes available for the month of closure EDBC is run and benefits authorized with no change. Worker generates a V808 using the copy and paste text for manual no benefit change notification of change from non-ABAWD to ABAWD. The worker will print and mail the Food Assistance Work Rules notice manually.

5. Gina was approved for Food Assistance in November 2025. Her countable ABAWD months are December 2025 – February 2026. In January, Gina provides documentation showing her 7-year-old niece has moved in with her. The niece is added to the food assistance case for February 2026 benefits. Gina is no longer an ABAWD as of January. The month of January is removed from the Time Limits page. The task that was set to close the case for use of ABAWD months is deleted and the case flag is end dated. System generated change notice is sent.
6. Steven is 62 and has a 24-month certification period. His review is being processed in November 2025. An interview will be required for his review since he is now considered an ABAWD. During the interview, the worker completes the ABAWD screening. Steven does not meet an exemption and is not meeting the 20 hours per week work requirement. The worker adds a record of “Did not meet work/training requirement” to the Time Limits page through the come-up month. The KEES system correctly identifies Steven as an ABAWD, so there is no need to set a future task to manually close his case. The worker will append the system-generated notice and add the copy and paste text for approval notice. The Food Assistance Work Rules notice is manually sent.
7. Ahmed and his partner, Julia, applied for Food Assistance in February 2026. They are both ABAWDs and do not have any children in the home. Julia received Food Assistance on another case and was discontinued in December 2025 for exhausting the ABAWD time limit. She is not meeting the work requirement and is not exempt. Ahmed is determined to be eligible. The KEES system correctly identifies them as ABAWDs. After running EDBC, the system-generated notice is appended with the copy and paste text for approval notice for Ahmed. The Food Assistance Work Rules notice is manually sent.
 - a. Same scenario as above, but Julia worked 80 hours in January and is eligible for the one-time three-month extension. The worker follows the process outlined in the KEES User Manual for adding an ABAWD record when the client receives an extension. After running EDBC, the worker will append the system-generated notice and add the copy and paste text for approval notice. The Food Assistance Work Rules notice is manually sent.
8. Susan and her partner, Ralph, applied for Food Assistance in January 2026. They are both ABAWDs and have one child in the home who is 15. Ralph received Food Assistance on another case and was discontinued in December 2025 for exhausting the ABAWD time limit. He is not meeting the work requirements and is not exempt. The KEES system does not identify them as ABAWDs because there is a child in the home. The worker adds a non-compliance record for the reason of failure to provide SSN for Ralph. Susan is working 20 hours per week and is meeting ABAWD work requirements, so the Time Limits page is updated to “met work/training requirement” through IR. EDBC is run, and benefits are authorized for Susan and the child. Ralph is denied for already receiving three ABAWD months. Approval notice is appended and copy and paste for approval notice when a household member is ineligible for using three ABAWD months text is added. The Food Assistance Work Rules notice is manually sent, and case flag is set.
9. Mayra and her husband Tim have twins aged 16. The Interim Report is received in January 2026 for February 2026 benefits. Since there are no children in the home under the age of 14,

the worker must complete ABAWD screening for both Mayra and Tim. The worker attempts collateral contact and is unsuccessful. The worker uses current information known to the agency to screen Mayra and Tim for exemptions. Mayra is currently working 10 hours per week and has no other exemptions. Tim is working 30 hours per week and meets ABAWD work requirements. The Time Limit page is updated for Tim to “met work/training requirement” through review. Mayra is not meeting, and the Time Limits page is updated to “did not meet work/training requirement” through the come-up month. All information was provided to process IR. The KEES system will not identify Mayra and Tim as an ABAWD because there are children in the home. The worker will set the future task for ABAWD months for Mayra, set a case flag, and add the documentation copy and paste text to the journal entry for both Mayra and Tim. The worker appends the notice to include copy and paste text for approval notice. The Food Assistance Work Rules notice is manually sent.

10. Rico is 25 and was approved for Food Assistance in November 2025. He is an ABAWD not meeting an exemption or the work requirement, and his three countable ABAWD months will be December, January, and February. In January, he reports his brother, age 17, has moved in with him. The child is added to the case for February, and when EDBC is run, KEES no longer identifies Rico as ABAWD. The worker has screened Rico and knows that he is still considered an ABAWD due to the minor in his household being 14 or older. March is available to run in KEES, so the future task is completed. The worker will add a Non-Compliance reason of Failure to Provide Social Security Number for Rico beginning March 1, 2026. The third countable ABAWD month of February is added to the Time Limits page. The system-generated change notice is deleted and replaced with a V808, with copy and paste text for benefits manual change added.

These changes are effective November 1, 2025. Sections 2520 and 2521 of the Kansas Economic and Employment Services Manual (KEESM) will be modified to reflect the updated ABAWD policy with the December 2025 revision.