What the 2025 Reconciliation Bill's SNAP Overhauls Could Mean for Children, Families, and States

The current <u>House-passed reconciliation bill</u> proposes sweeping changes to the Supplemental Nutrition Assistance Program (SNAP), with substantial reconfiguring in both design and administration of one of the country's landmark benefit assistance programs. The bill seeks to more explicitly link SNAP participation and food assistance to employment, household income generation, and individual compliance – while significantly increasing state program responsibilities.

The reconciliation package alone is projected to reduce federal SNAP benefit spending by \$128 billion over ten years.ⁱ Framed by proponents as a push for "self-sufficiency" and program "integrity," the proposal risks increasing food insecurity, constraining state budgets, and entrenching new administrative barriers – particularly for households with young children.

At a Glance

States would face unprecedented cost-sharing and oversight burdens. States would immediately cover 75% of SNAP administrative costs and, beginning FY 2028, must pay at least 5% of benefit dollars – rising as high as 25% for high error-rate states.ⁱⁱ Meanwhile, the longstanding \$57 "forgiveness" buffer would be removed, so even \$1 discrepancies count against state error rates. This will shift billions in annual spending burdens to state budgets and force extra audits and corrective work that pull staff away from processing applications – all likely to delay and disrupt benefit receipt for families with young children.

Monthly benefit amounts would be permanently fixed. Freezing the 2021 Thrifty Food Plan update and capping future cost-ofliving adjustments will shrink average SNAP benefits by roughly \$15 per month by 2034.ⁱⁱⁱ This is equivalent to about a 9-10% cut in benefit value for the typical household.

Work requirements would be extended to more SNAP participants, and made more burdensome for single caregivers – amid sharply reduced state waiver flexibilities. The "able-bodied adults without dependents" (ABAWD) age ceiling would rise from 54 to 64. Parents of children 7-17 must also meet 80 hours per month of work-or-training to avoid losing benefits after three months. While in cohabitating couples, just one parent can meet this requirement, single caregivers face the same requirements and potential sanctions alone. States may only waive these requirements in counties where 12-month unemployment exceeds 10%.

Refugees and asylum seekers would be removed from SNAP access. The bill cuts support for recent refugees and asylum applicants, stripping a critical safety net from newly arrived families.

Broad-based categorical eligibility (BBCE) would be indirectly targeted for elimination. Though BBCE remains statutory, the new state cost-share stipulations are likely to incentivize BBCE states to roll back expanded income and asset thresholds, potentially dropping millions of recipients from SNAP and free school meal access.



Policy Area	Proposed Changes	Current Federal SNAP Policy	Top-Line Implications for Families with Young Children
State cost- sharing and payment error oversight	 States go from paying 50% of administrative costs to 75%. By FY 2028, states must cover at least 5% of benefits – rising to 25% for high error-rate states. SNAP's error rate tolerance measure is removed, so all payment mistakes count against a state's error rate.^{iv} 	 States and USDA share administrative costs evenly. SNAP benefits themselves are fully federally funded. Payment mistakes under \$57 are forgiven and do not affect a state's error rate. 	States facing new costs may cut eligibility staffing, outreach, or other services. Zero-tolerance for tiny errors will drive up reported error rates, triggering audits and corrective plans that pull staff away from processing applications – likely to delay benefit checks for families with young children. <i>More on this policy lever and its impacts.</i>
Benefit amounts	Freeze the 2021 Thrifty Food Plan (TFP) update and cap future boosts to match only the broad Consumer Price Index (CPI), not actual food-price changes.	Annual benefit updates reflect the latest Thrifty Food Plan cost plus inflation adjustments.	Fixing TFP and cost of living adjustments will result in significant benefit cuts of roughly \$15/month by 2034, making it more difficult for parents to secure consistent, nutritious meals during critical developmental periods. <i>More on this policy lever and its impacts.</i>
Work requirements	 ABAWDs 18-64 must work or train 80 hours per month or lose benefits after 3 months. Parents of children 7-17 must work/train 80 hours per month or lose benefits after 3 months. While for married or cohabitating couples, this need only apply to one parent, single caregivers must meet the full requirement on their own. Limit waivers to only counties with 12-month unemployment over 10%. 	 ABAWDs over 50 are exempt from work requirements. Parents must register for work/training but do not lose benefits after a time limit. Marital or cohabitation status does not affect eligibility. States can waive requirements more responsively in areas with high unemployment or other hardships. 	Millions of adults and caregivers are projected to lose SNAP by failing to meet the extra hours or hitting the 3-month cutoff. Single parents – already more likely to lack stable child care – will be most at risk of sudden benefit loss and deeper food insecurity for their families. Waiver limitations will weaken counties' ability to respond to local employment shocks or emergencies. <i>More on this policy lever and its impacts.</i>
Refugees and asylum seekers	Remove SNAP eligibility for recent refugees and asylum applicants.	Federal SNAP statute extends SNAP to refugees and asylees.	Newly arrived families, often without community ties or other supports, would lose their only federal food aid, putting families with infants and toddlers at immediate risk. <i>More on this policy lever and its impacts.</i>
Broad-Based Categorical Eligibility	While the proposed legislation does not restrict states' ability to file waivers to alter asset or income limits, the new state cost-sharing obligations will incentivize states to roll back expanded eligibility under BBCE waivers.	 As of April 2025, 45 states and jurisdictions implement BBCE to expand eligibility beyond strict federal income/asset limits. 	Rolling back BBCE provisions in any state that has implemented them would instantly cut program and free school meal access for millions of recipients, worsening hunger and adding new paperwork barriers for parents already stretched thin. <i>More on this policy lever and its impacts.</i>

NCCP Bank Street Graduate School of Education

Severe state cost-sharing and oversight changes

Under current SNAP rules, the federal government fully covers benefit costs, and administrative expenses are split roughly 50/50 between the USDA and states. The reconciliation bill immediately raises states' share of administrative costs to 75% and, beginning in FY 2028, requires states to pay at least 5% of total SNAP benefit expenses – and as much as 25% of these expenses for states with higher payment-error rates. This is the first time states must pay a portion of benefit dollars.

Simultaneously, SNAP's longstanding quality control measure in audits, the \$57 "forgiveness buffer," is dropped entirely. Under current policy, benefit payment mistakes of less than \$57 are forgiven and do not count against a state's error rate – but the new policy would count every cent of discrepancy.^v

The Urban Institute projects that shifting even the lowest 5% benefit match onto states will transfer billions in fiscal obligation from federal to state budgets every year.^{vi} Further, without the \$57 buffer, states' reported error rates will spike. Even trivial clerical mistakes could trigger mandatory corrective plans, staff retraining, and system audits. These parameters place more of a burden on state agencies that will likely divert caseworker time away from participant support and toward administrative review, delaying application processing, benefit issuance, and other support services for those who rely on SNAP for their nutritional well-being. Families with young children for whom timely nutrition support is critical may experience gaps or delays in assistance. The sweeping and unprecedented nature of these costsharing features also puts complementary support systems at risk other essential state-administered services and infrastructures could be roped into cuts as states work to reorganize their significantly limited resources.vii

Frozen benefit amounts

SNAP benefit levels are based on the Thrifty Food Plan (TFP) cost plus annual cost-of-living adjustments (COLAs). In 2021, USDA updated the TFP to reflect current food costs, ultimately raising baseline benefits. The reconciliation bill freezes the TFP at its 2021 level and caps future COLAs strictly to changes in the general Consumer Price Index, rather than to more specific food-cost adjustments. The Congressional Budget Office (CBO) projects these measures will shrink average SNAP benefits by roughly \$15 per household per month by 2034 – equivalent to a 9-10% cut in benefit value for a typical family.^{viii}

Because food prices are typically more volatile than the general inflation rate, families could also feel bigger losses in what SNAP can buy.^{ix} When benefits don't keep up, parents may have to substitute cheaper, calorie-dense but nutrient-poor foods, undermining SNAP's purpose of alleviating malnutrition.^x In higher-cost regions or food deserts, the squeeze is even worse: out of necessity, families may turn more to emergency food providers or stretch more limited, local resources. These reductions would pose a potential long-term threat to low-income children's health and development while also putting even more strain on community programs and health services.^{xi}

Harsher work requirements

Currently, able-bodied adults without dependents (ABAWDs) aged 18-54 must work or participate in training for at least 80 hours per month to receive SNAP beyond three months; adults 50 and over without dependents are exempt. Parents of children aged 7-17 must register for work or training and accept an offer of employment, but they face no fixed time limit on benefits. This changes with the reconciliation bill – the ABAWD age range expands to 18-64, and parents of children 7-17 become subject to the same 80-hours per month rule with a threemonth cutoff. The bill also incorporates language that further complicates program access for single parents and caregivers, who must satisfy the full requirement alone despite a new provision enabling just one parent in a married or cohabitating couple to fulfill the work requirement while the other parent is not required to work.

Waiver authority is also narrowed so states may exempt households only in counties with 12-month unemployment above 10%. Currently, only ten counties nationwide meet this qualification.^{xii} The CBO estimates roughly 3.2 million adults would lose SNAP benefits in an average month under these expanded requirements, including



approximately 800,000 parents of children 7-17 and 1 million adults aged 55-64.^{xiii} Data from the Center on Budget and Policy Priorities (CBPP) indicate around 75% of parents newly subject to the cutoff are single mothers, many facing childcare barriers or irregular work hours.xiv Restricting waiver access removes flexibility for localized downturns, so families cannot temporarily maintain benefits during economic shocks, natural disasters, or other community-wide hardships. The administrative burdens on states could also grow as more complex compliance verification and eligibility reviews are likely to increase error risk and delay benefit approval or distribution. For families with young children, sudden benefit loss or processing delays mean immediate nutrition gaps. Single-parent households, already more likely to lack stable childcare or predictable schedules, are disproportionately at risk of sudden disqualification. Reduced local responsiveness also means that families cannot rely on SNAP as a timely safety net in times of crisis.

Exclusion of refugees and asylum seekers

Refugees and asylees are currently eligible for SNAP under federal law, but the reconciliation bill removes this eligibility for both recent refugees and asylum applicants.^{xv} Each year tens of thousands of refugees and asylees resettle in the U.S. - frequently arriving with little cash and facing immediate needs. Denying SNAP means infants and toddlers in these families lose a critical source of nutrition during a vital developmental window, throughout which early childhood food insecurity remains a prominent and proven driver of adverse health and cognitive outcomes.xvi

Excluding refugees and asylees not only threatens family well-being, but it also places strain on resettlement agencies and local communitybased organizations that cannot fill the gap fully. Families may face housing or health care trade-offs when forced to purchase food out of limited cash, potentially delaying medical visits or work opportunities

essential for finding stability in the U.S.^{xvii} Further, the potential shortterm savings of this measure will likely generate long-term costs for the nation, including increased healthcare needs and subsequent expenditures, delayed workforce integration, and an even greater pressure on social service.

Threatened Broad-Based Categorical Eligibility (BBCE)

As of April 2025, 45 states/jurisdictions use BBCE to qualify more families for SNAP by linking eligibility to TANF or raising income limits.^{xviii} While the reconciliation bill does not formally repeal BBCE, it forces states to pay 5-25% of benefit costs and 75% of administrative costs – pushing a strong fiscal incentive for states to rescind their expansions. CBPP estimate that if BBCE states roll back their policies, close to 6 million people could lose SNAP.^{xix} BBCE also often provides direct certification for free school meals. An estimated 420,000 children nationwide could lose automatic free school meal access without it.xx

Any significant tampering with BBCE would also trigger a surge of individual income and asset checks, reapplications, and appeals that would likely overload state caseworkers and delay application and renewal processes.^{xxi} Families in temporary crisis – after a job loss, the arrival of a new baby, or facing housing instability – would suddenly have to prove they meet stricter rules or risk losing benefits.

These administrative barriers would place additional stress on parents, especially those with limited time, transportation, or Internet access. Rural areas or communities of color with weaker administrative capacity and fewer alternative supports may see deeper disruptions, widening existing health and nutrition disparities among young children.xxii Finally, stricter asset limits may force families to spend down small savings meant for emergencies or education just to stay eligible, undermining long-term financial stability and children's futures.xxiii

ⁱ https://www.cbo.gov/publication/61420

NCCP National Center for Children in Poverty Bank Street Graduate School of Education

ⁱⁱ https://www.crfb.org/blogs/breaking-down-one-big-beautiful-bill

- https://democrats-agriculture.house.gov/news/documentsingle.aspx?DocumentID=2961
- ^w https://feedingamericaaction.org/wp-content/uploads/Analysis FY25House Budget Reconciliation.pdf
- * https://feedingamericaaction.org/wp-content/uploads/Analysis FY25House Budget Reconciliation.pdf
- vi https://www.urban.org/sites/default/files/2025-04/SNAP-state-cost-share-final.pdf
- vii https://www.ncsl.org/resources/details/ncsl-raises-concerns-about-snap-cost-shifts-to-states
- viii https://www.cbo.gov/publication/61420
- ix https://www.urban.org/data-tools/does-snap-cover-cost-meal-your-county
- * https://uknowledge.uky.edu/cgi/viewcontent.cgi?referer=https://scholar.google.com/&httpsredir=1&article=1117&context=ukcpr papers
- ^{x1} https://frac.org/blog/part-4-proposed-snap-cuts-the-health-and-economic-impact-on-families-with-young-children
- xⁱⁱ <u>https://www.cbpp.org/research/food-assistance/worsening-snaps-harsh-work-requirement-would-take-food-assistance-away</u>
- xiii https://www.cbo.gov/system/files/2025-05/Klobuchar-Craig-Letter-SNAP 5-22-25.pdf
- ** <u>https://www.cbpp.org/research/food-assistance/house-reconciliation-bill-proposes-deepest-snap-cut-in-history-would-take</u>
- ** https://www.cbo.gov/system/files/2025-05/Klobuchar-Craig-Letter-SNAP 5-22-25.pdf
- xvi https://www.zerotothree.org/resource/no-baby-goes-hungry-ensuring-infant-and-toddler-food-security/
- xvii https://www.americanimmigrationcouncil.org/research/house-reconciliation-bill-immigration-border-security
- xviii https://www.fns.usda.gov/snap/broad-based-categorical-eligibility
- xix https://www.cbpp.org/research/food-assistance/house-reconciliation-bill-proposes-deepest-snap-cut-in-history-would-take
- ** https://fns-prod.azureedge.us/sites/default/files/resource-files/ops-snap-trendsfy20-fy22-report.pdf
- xii https://frac.org/blog/protecting-states-rights-to-streamline-food-assistance-access-and-prevent-increased-administrative-costs
- xiii https://www.cbpp.org/research/food-assistance/snap-is-linked-with-improved-health-outcomes-and-lower-health-care-costs
- xiii https://firstfocus.org/resource/what-proposed-federal-budget-cuts-andpolicy-changes-will-cost-children/

