

Improving Family Economic Security Nutritional Assistance: State Policies and Legislation

June 22nd, 2026



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Agenda

- **Current and ongoing declines in SNAP participation**
- **The “Perfect Storm” facing states, agencies, and families (and a review of BBCE)**
- **Advocacy topics**
- **Declines in WIC participation**
- **School Meals**
- **Summer EBT**

A “Perfect Storm” of challenges for SNAP participation

👉 Reasons for a decline in your state may include some or all of the following:

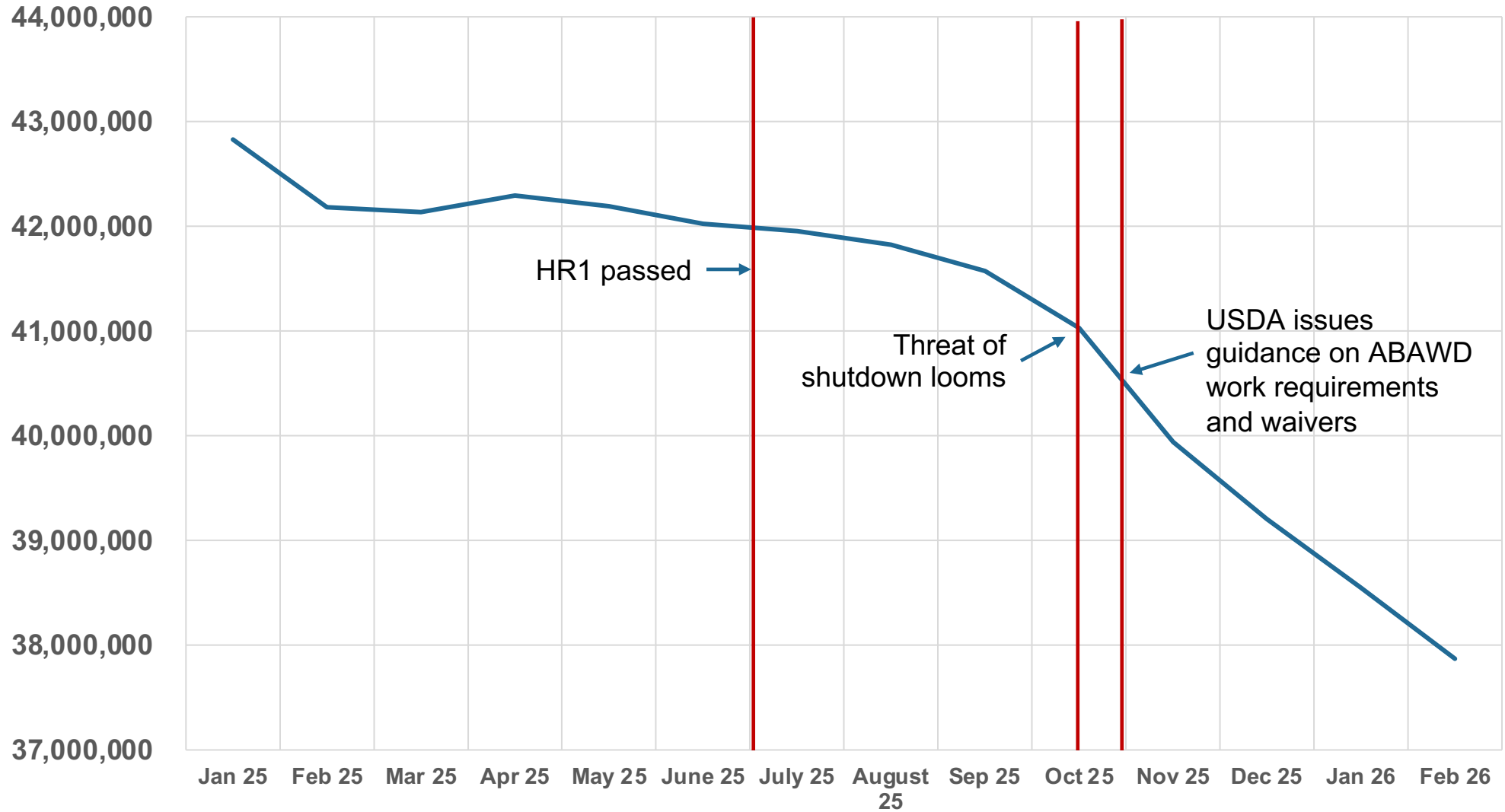
All states are experiencing	Multiple states also contend with
<p>Increased demands on administrative staff because of new guidelines on who is responsible for the ABAWD or “3-month time limit” work requirements* + End of most ABAWD waivers</p>	<p>Agency staff shortages and office closures in several states</p>
<p>Budget constraints arising from increased administrative costs beginning in October 2026</p>	<p>Benefit cost-sharing penalties for states with high payment error rates beginning in October 2027 or October 2029</p>
<p>Increased restrictions on immigrant and mixed status families’ eligibility, alongside the chilling effects of current enforcement practices</p>	<p>Changes to eligibility so that families with gross income above 130% FPL lose eligibility overnight</p>
<p>Confusion arising from changing guidelines: some parents and guardians losing SNAP for themselves believe their children have automatically lost it as well.</p>	<p>Reinstatement of asset limits, which in addition to making some families ineligible adds to agency staff’s workload and administrative barriers for parents</p>

👉 Declines are projected to continue.

Declines in SNAP participation in 48 states

- A decline in participation has been underway since last year and has accelerated in recent months, as state agencies are contending with threats to their budgets from HR1, immigrant and mixed status families contend with shifting rules on public charge and eligibility, and “impact dates” for ABAWD time-limit work requirements are occurring.
- **This decline includes children.** Across all age groups, we know for certain that ~770,000 fewer children participate in SNAP today than did in July, 2025. We don’t have the full number across all states, but some project that number > 1 million.
- Potential changes from the federal administration are on the horizon that are likely to further restrict access to SNAP, including a potential end to BBCE.

U.S. SNAP Participation: All Ages Jan '25 – Feb '26



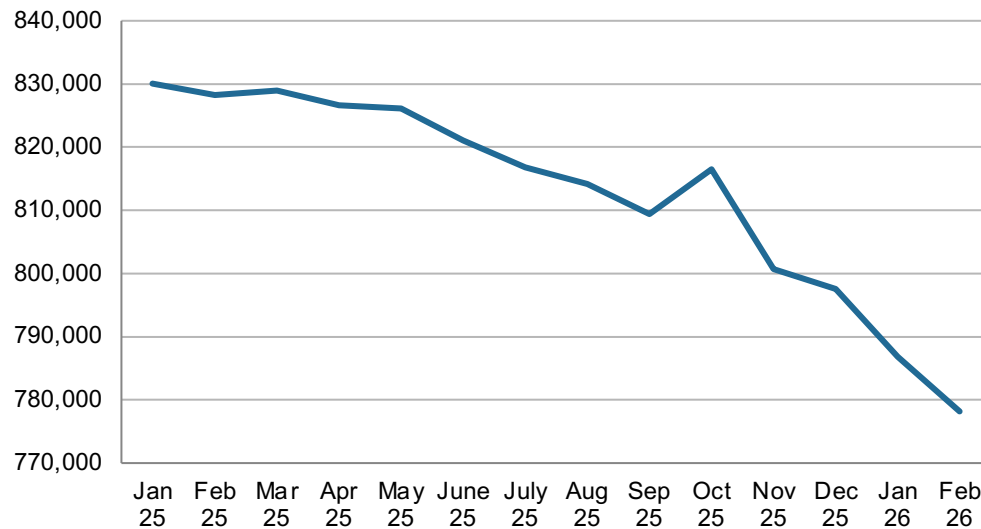
Ten states with highest % decline in individuals receiving SNAP

	Decline # Feb 25 → Feb 26	% Decline Feb 25 → Feb 26
United States	4,314,445	-10.2%
Arizona	443,589	-49.7%
North Carolina	274,376	-18.6%
Louisiana	137,000	-16.7%
Florida	446,065	-14.9%
Georgia	226,695	-14.9%
Nevada	74,214	-14.8%
Virginia	116,752	-14.4%
Oklahoma	97,235	-14.0%
Rhode Island	20,231	-13.7%
Wyoming	3,834	-13.6%

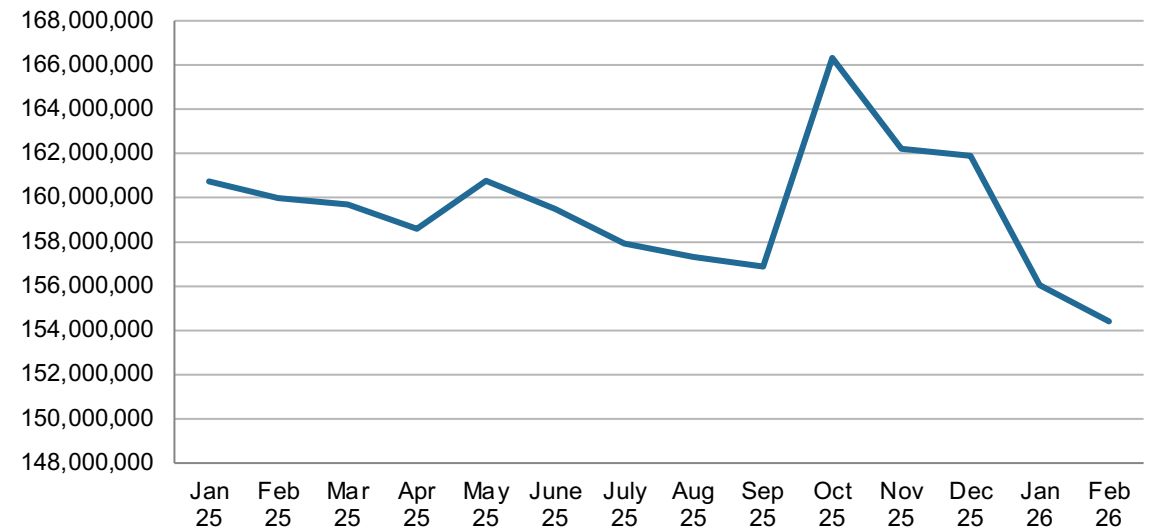
New Jersey: Declines in Participation and Benefit Data (USDA data)

💡 New Jersey continues to provide SNAP to families with gross income no greater than 185% FPL and imposes no asset limit. The state implemented new guidelines for work requirements on February 1, 2026, and is actively working to prevent “drop-offs” from changing guidelines to work requirements. Recertification periods remain 12 months for most families, but an interim report is due every 6 months.

6.3% Decline in SNAP Participants from Jan 2025 to Feb 2026



3.9% Decline in SNAP Benefits from Jan 2025 to Feb 2026



Declining participation since July 2025 for children.

State (Most Recent)	# Change in Child Participation	% Change in Child Participation
Arizona (4/26)	-205,223	-55%
Louisiana (4/26)	-79,148	-22%
Texas (4/26)	-253,060	-15%
Massachusetts (3/26)	-49,429	-15%
Kansas (4/26)	-10,331	-12%
Ohio (12/25)	-47,806	-8%
South Dakota (3/26)	-2,793	-8%
Maine (4/26)	-4,306	-8%
Michigan (4/26)	-37,519	-7%
Maryland (4/26)	-17,267	-7%
New Mexico (3/26)	-9,478	-6%
New Jersey (2/26)	-12,132	-4%



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Data WANTED: Breakdown for Participants by Age

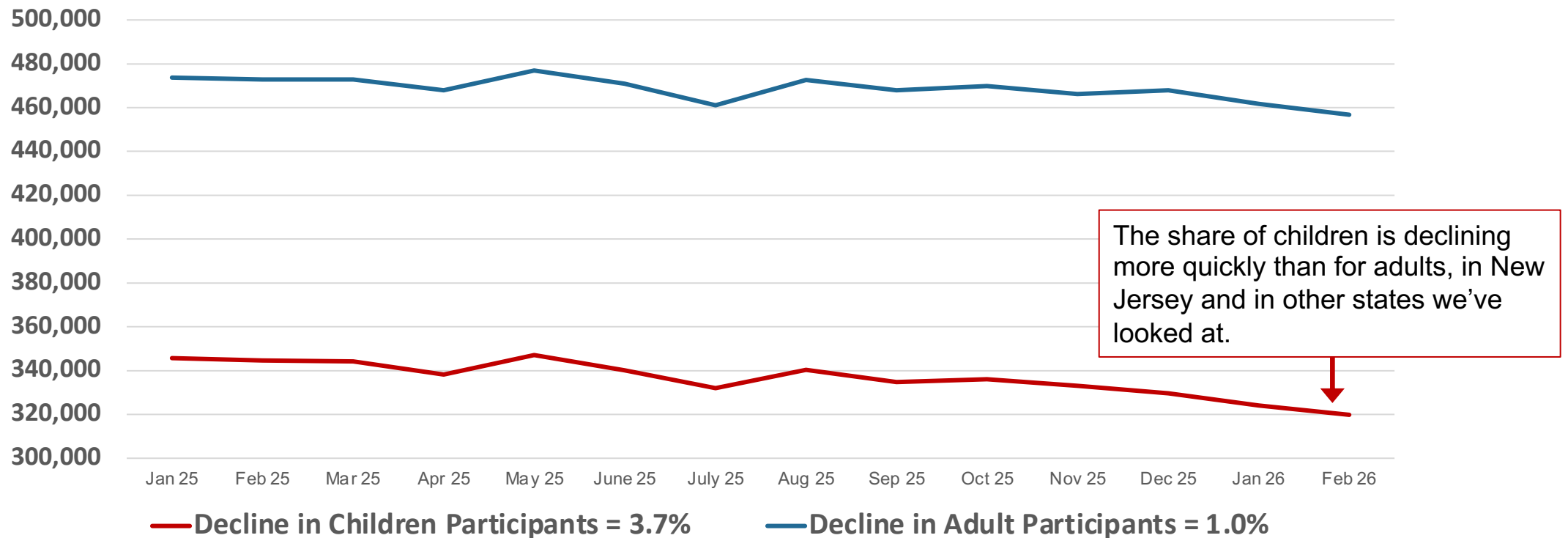
- Only 14 states have provided this breakdown so far.
- The evidence provided shows that children are losing SNAP, contrary to what HR1's proponents predicted.
- NCCP notices: in the states that have provided these data, that while most of those losing the benefit appear to be adults, the share of children is dropping more steeply, month to month, than the share of adults.



New Jersey: Declines in Participation for Adults and Children

💡 The state provides publicly available data on participation by age of individuals from July 2025 to February, 2026. **During those months, there was a 3.7% drop in children’s SNAP participation.**

Decline in SNAP Participants by AGE from July 2025 to February 2026



Three Pathways to Initial SNAP Eligibility

Federal Pathways		State Pathway With Flexibilities
A. Standard	B. Traditional* Federal Categorical Eligibility	C. Broad-Based Categorical Eligibility (BBCE)
Available to all US citizens and those with sufficient immigration status who meet the requirements below.	Available to households in which every member receives cash assistance through either TANF, SSI, or General Assistance.	Available in states that adopt BBCE to households considered BBCE-eligible; states choose which of the following changes to make to requirements from column A.
R e q u i r e m e n t s		
130% FPL gross income limit (\$34,645/year fam of 3)	No eligibility tests; recipients have already qualified for programs (like TANF) with more stringent requirements.	<ul style="list-style-type: none"> Option: Extend gross income limit as high as 200% FPL (~\$53K/year fam of 3)
\$3,000 asset limit in cash or bank accounts		<ul style="list-style-type: none"> Option: Increase or remove asset limit
100% FPL net income limit (\$26,650/year fam of 3)		<ul style="list-style-type: none"> Option: Remove net income limit

Proposed Rule Change (Expected) to Eliminate BBCE Will Increase Food Insecurity

Impact of Eliminating BBCE: Working Mom with One Child

Gross Income	% of Federal Poverty Level	Monthly SNAP amount under current rules	SNAP amount without BBCE
Hourly Wage @ 40 hours/week x 4.3 weeks		(assuming high shelter costs and \$600/month childcare)	
\$12/hour = \$2079/month	115%	\$513	\$513
\$14/hour = \$2408/ month	133%	\$434	Not SNAP eligible
\$15/hour = \$2580/month	143%	\$393	Not SNAP eligible
\$18/hour = \$3096/month	171%	\$269	Not SNAP eligible

New Evidence Highlights Adverse Effects of Work Requirements for First-Time Mothers' Children

- A new study investigated the effects of the implementation of work requirements for Able-Bodied Adult Without Dependents (ABAWDs) (through the loss of ABAWD waivers) in the months just before pregnancy for first-time mothers.
- The implementation of ABAWD work requirements caused the loss of nutritional assistance prior to pregnancy. In affected women, it is linked to **statistically significant increases in very low birthweight** (i.e., babies weighing less than 3 pounds, 5 ounces) and a **higher incidence of very preterm births**. The implementation of ABAWD work requirements thus placed children at risk for a range of serious health risks in the beginning of their lives and in the longer term.

Justifications for declining SNAP participation numbers

- The economy has lifted many out of poverty so that they no longer need the benefit. Declining participation is an organic “adjustment,” bearing no relation to H.R.1’s passage.
- Participation *should* have declined after the pandemic, but “soft” guidelines facilitated by BBCE expansion in many states along with increased benefit amounts have led to overreliance, reluctance to work, and even fraud or “improper payments.”
- The expansion of work requirements to additional groups of adults is ultimately helpful to their economic security and mobility.
- New cost-sharing penalties for states are fair and necessary.
- These changes aren’t affecting young children, because H.R.1 never “targeted” them.

Have families' economic conditions improved?

- **Continued high food costs and increases in the costs of other basic expenditures,** particularly for fuel oil (54.3%), gasoline (28.4%), and electricity (6.1%). - EPI, U.S. BLS
- **Wage stagnation.** During 2025, inflation-adjusted wages for low-income workers declined by 0.3%, in a reversal following increases during the previous five years. – U.S. BLS
- **Steady levels of unemployment alongside increasing numbers of those employed in part-time work who would prefer full-time work.** The number of those employed part time for “economic reasons” increased by almost 10% in April 2026, to nearly 4.9 million. U.S. BLS
- **Families' economic challenges are further reflected in reported increases in credit card and other forms of debt obligations, including mortgage debt and home equity lines of credit.** Data from the Federal Reserve Bank of New York show a year-over-year aggregate increase of \$591 billion in the first quarter of 2026 comparison to the same period of 2025. – FRBNY



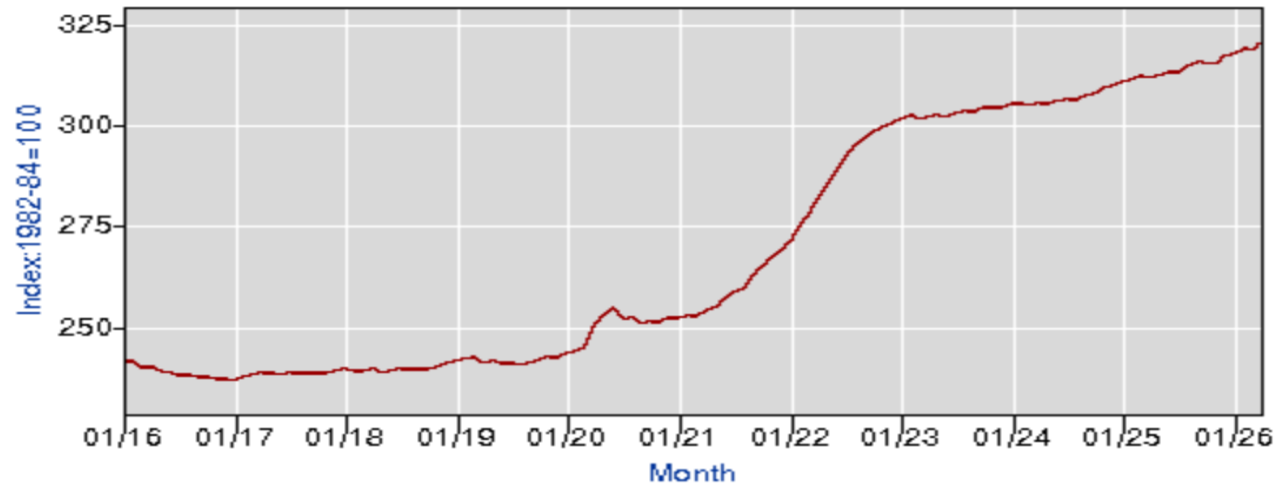
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Food costs have increased since the pandemic and continue to rise today.

Consumer Price Index for All Urban Consumers (CPI-U)

Series Id: CUSR0000SAF11
Seasonally Adjusted
Series Title: Food at home in U.S. city average, all urban consumers, seasonally adjusted
Area: U.S. city average
Item: Food at home
Base Period: 1982-84=100



Recommendations to curb SNAP Payment Error Rates (PER)

- **Use Simplified Reporting rather than Change Reporting.** Fewer updates to income mean lighter burdens for participants and caseworkers, and fewer opportunities for errors.
- **Don't Impose Asset Tests for SNAP (including those for non-cash property).** Again, this will lighten administrative tasks that are very challenging and lessen the likelihood of errors. Miscalculation of assets can result in very large payment errors.
- **Don't Limit Discretionary Exemptions.** Agencies have the option to provide a certain number of exemptions “at discretion,” and these can be helpful in limiting casework overload.
- **Don't Continuously Monitor Income For Medicaid.** In states where SNAP and Medicaid systems are integrated (as they increasingly are), monthly updates to income (for Medicaid) will automatically trigger potential burdens and potential payment errors.

Local advocacy resource: New Mexico

In New Mexico: a series of “Know Your Rights” resources addressing food security and access to SNAP. A resource on understanding exemptions from work requirements is pictured here.

KNOW YOUR RIGHTS

How to Show You Are Exempt from SNAP Work Requirements



Updated March 4, 2026

Starting January 2026, more adults have to show proof they are doing paid or unpaid work for an average of 20 hours a week (or 80 hours total per month). Adults will lose SNAP after three months of not meeting the requirements.



If you are exempt, you do not have to show that you are working. You can also receive SNAP even if your benefits were previously ended for not meeting the work requirements.

YOU ARE EXEMPT IF YOU ARE:

- ✓ Working 30 hours a week.
- ✓ Earning at least \$217.50 a week on average (or 30 hours at federal minimum wage \$7.25).
- ✓ Under 18 or over 64 years of age.
- ✓ Live with someone under 14.
- ✓ Pregnant.
- ✓ Unable to work 30 hours a week due to a physical or mental concern.
- ✓ Chronically homeless (See IPP 18-04: homeless for more than 6 months, more than once in the last year, or unable to meet basic necessities of everyday life: shelter, food, lights, heat, water or clothes)
- ✓ Native American recognized under federal law, including being a member of a federally recognized tribe and qualifying for care at Indian Health Service for reasons other than having a spouse who qualifies.
- ✓ A student enrolled half time or more in a school, training program, college or university.
- ✓ Participating in a drug or alcohol treatment and rehabilitation program on a regular basis.
- ✓ Applying for or receiving Unemployment Benefits.
- ✓ Applying for or receiving Social Security Disability or Supplemental Security Income through the Social Security Administration.

New Jersey: Proposed State Legislation to Protect Participation Through Volunteer Work

💡 Speaker Coughlin's proposed A3883 would **make it easier for SNAP beneficiaries to find volunteer work**. Under the bill, the Department of Human Services would be directed to work in collaboration with the Governor's Office of Volunteerism and the Department of Labor and Workforce Development, to expand and modify the State's network of existing volunteer resources and would **update a state portal to allow the public to search and apply for bona fide volunteer opportunities that comply with the federal requirements and submit their volunteer hours**.

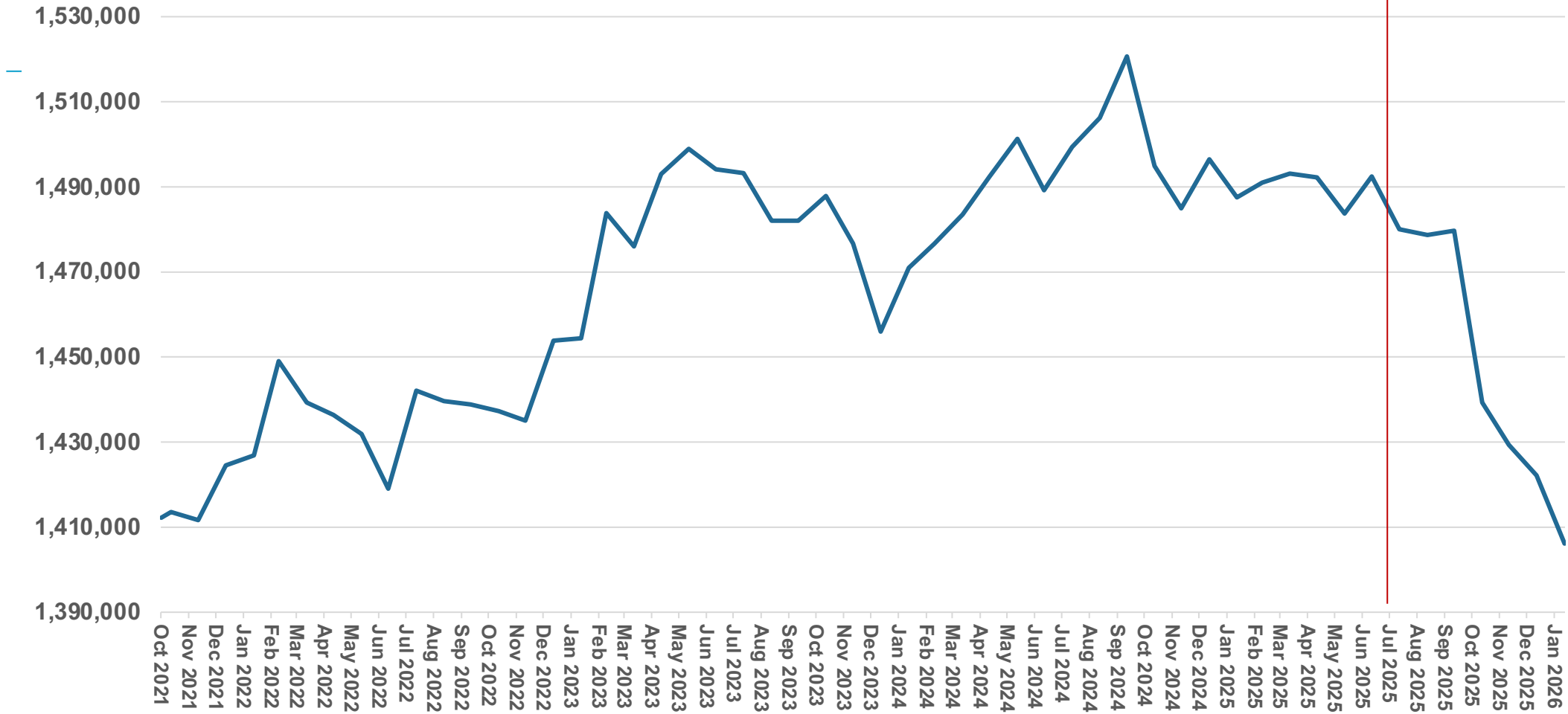
Already in effect:

- 💡 New screening tools have been created for County Social Service Agency (CSSA) workers to assist with **screening for exemptions from the work rules**.
- 💡 Caseworkers and systems **automatically cross-screen individuals**. If an individual meets the new work requirements for NJ FamilyCare (Medicaid), they are automatically marked as compliant for SNAP.

WIC participation distinct from and connected to SNAP

- Unlike SNAP, WIC is a public health program, intended to be accessed by all who meet income limits (185% FPL) and **without requirements relating to citizenship or immigration status. However, the current climate of immigration enforcement has likely had a profoundly chilling effect on many parents and guardians, even if they and their children are eligible for WIC.**
- Enrollment in the program has been made easier through **adjunctive eligibility**, so that receiving TANF, Medicaid, or SNAP has made individuals and families automatically eligible for WIC. Roughly $\frac{3}{4}$ of participants have enrolled in this way in past years. **Families who have lost SNAP in recent months may not be aware that they could apply separately for WIC.**
 - 💡 For advocacy: A particularly solid evidence base points to important effects of the program on a range of health outcomes for infants and young children as well as positive effects on cognitive development and academic achievement in later years.

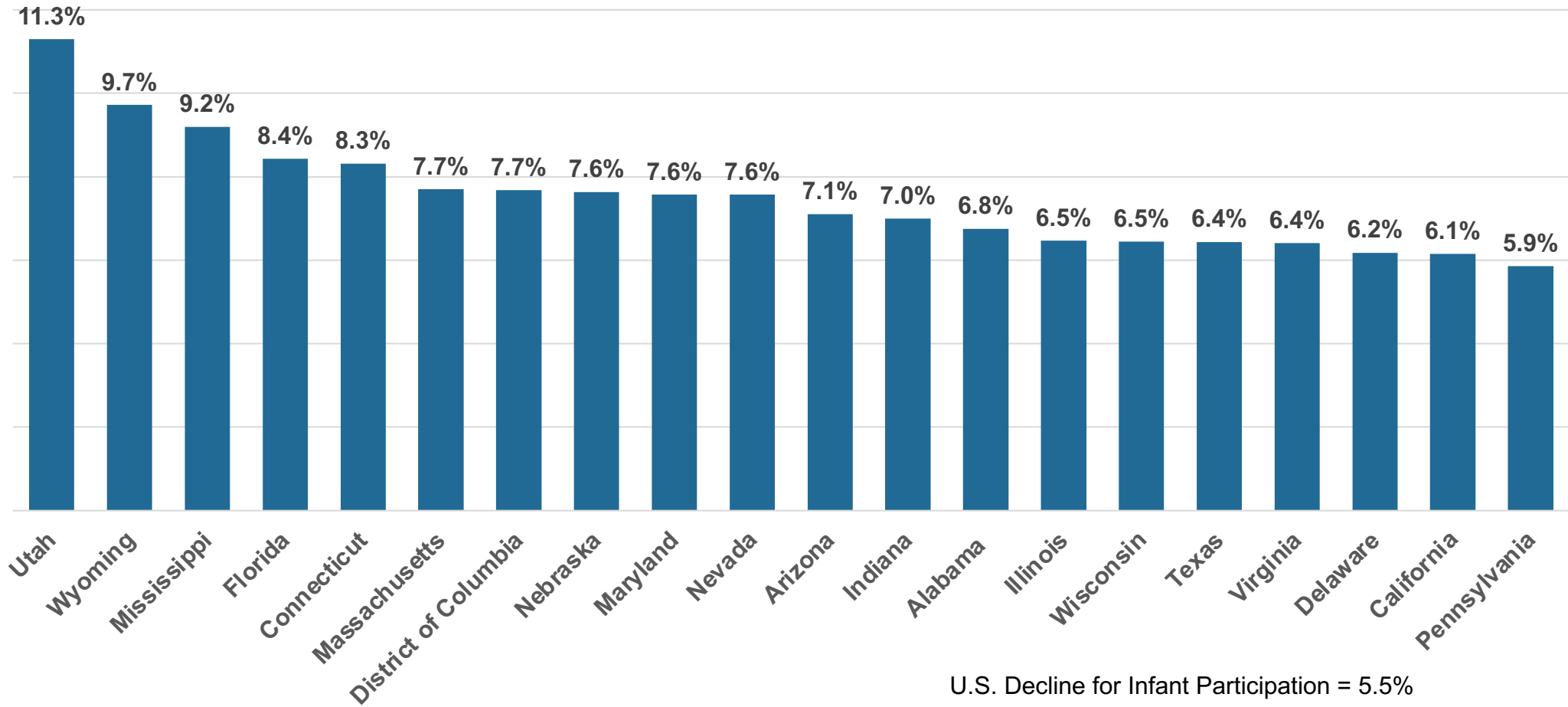
WIC Participation for Infants FY2022-2026



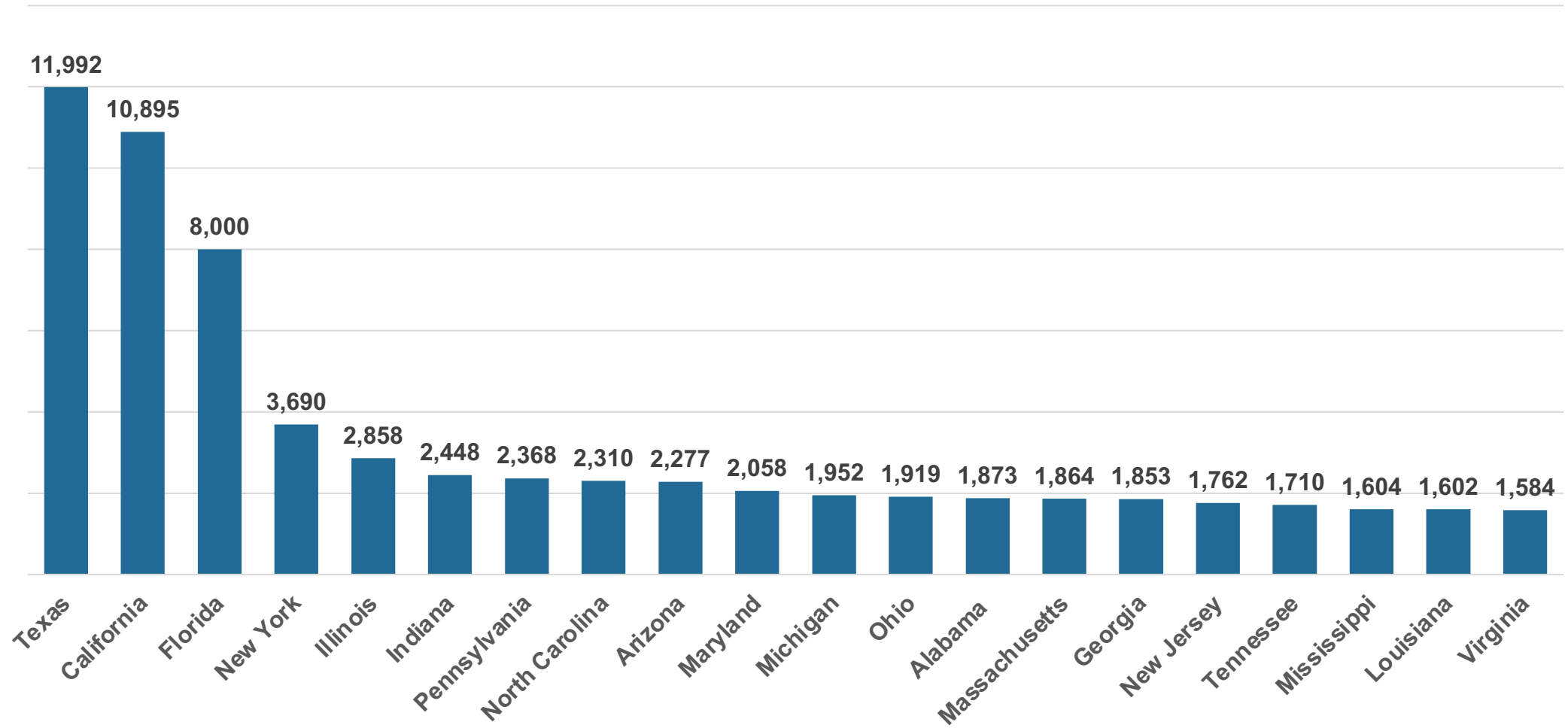
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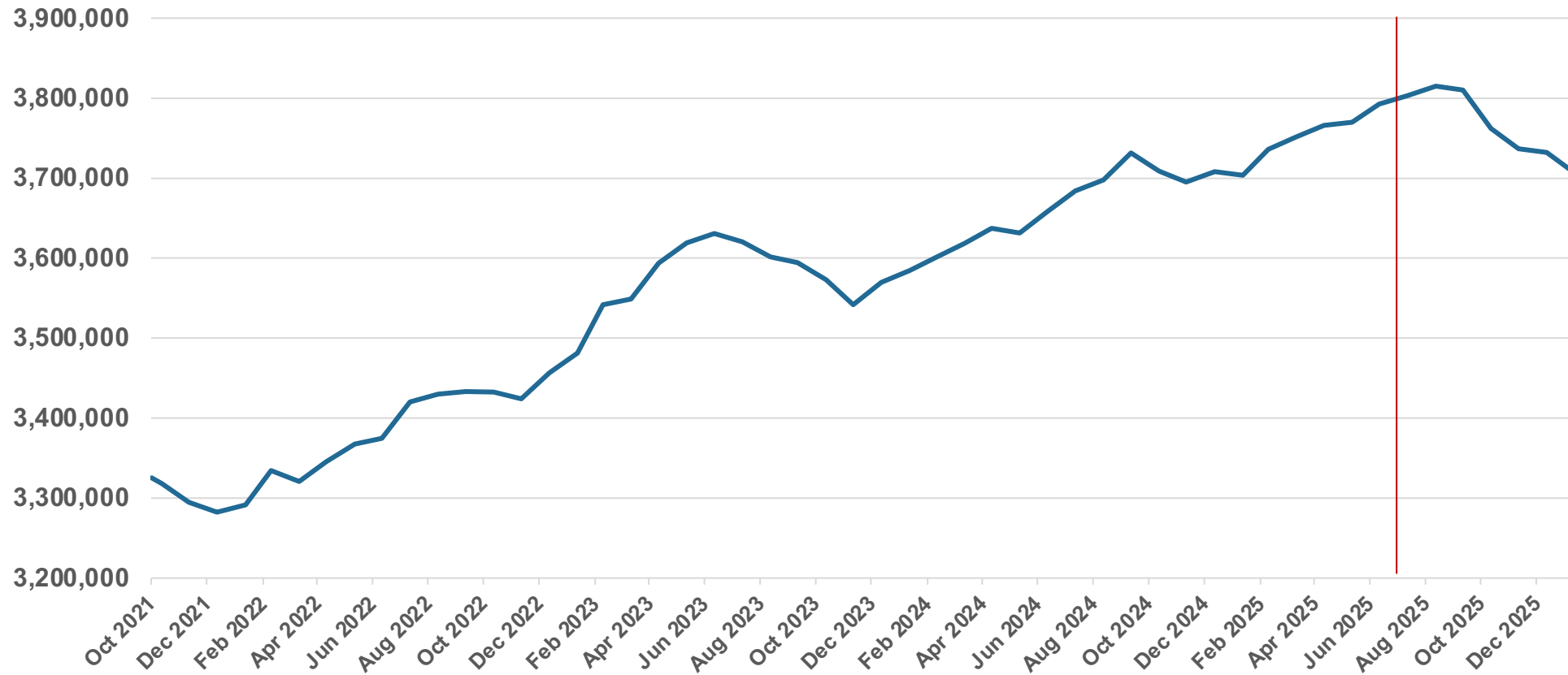
Decrease in WIC Participation February 2025 - February 2026: Top 20 States by Decline in Share of State Participation by Infants



Decrease in WIC Participation, February 2025 - February 2026: Top 20 States by Decline in Number of Infants



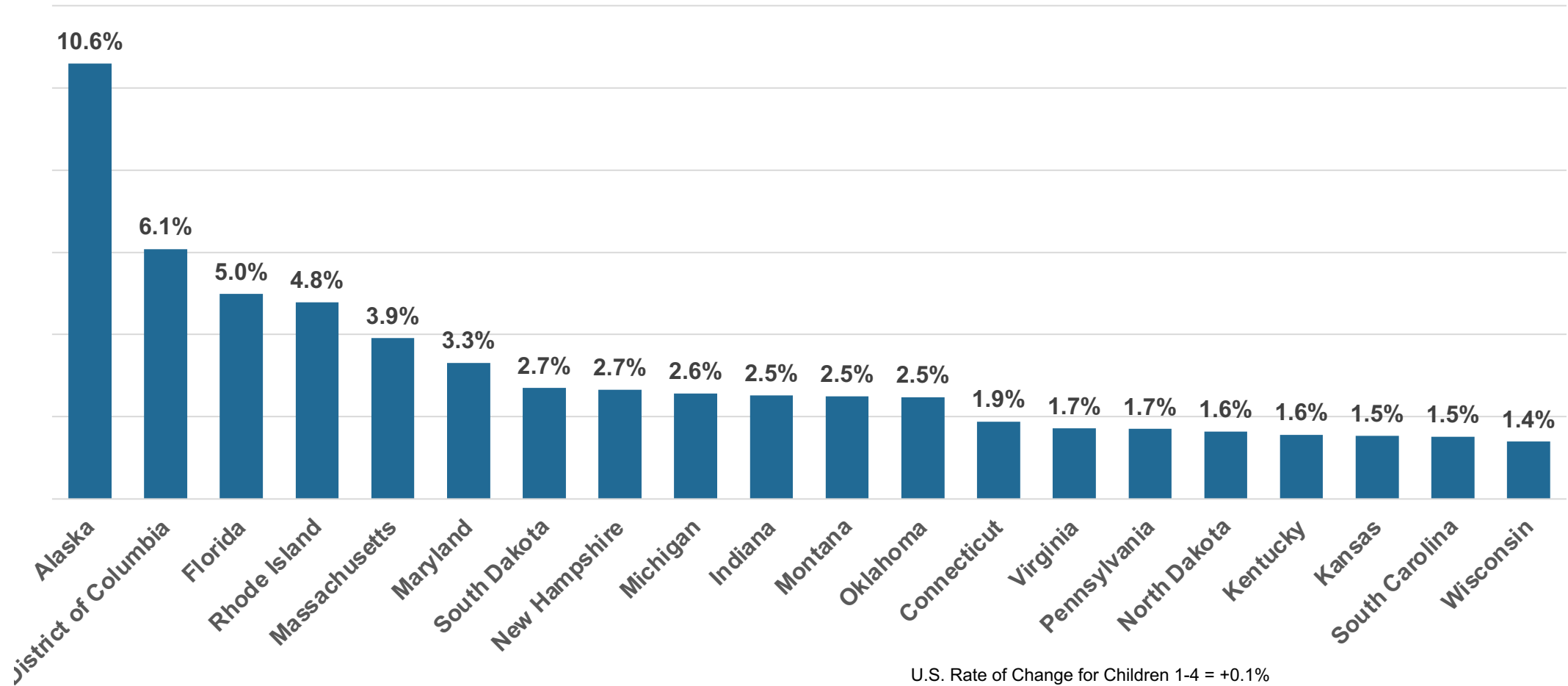
WIC Participation for Children ages 1-4 FY2022-2026



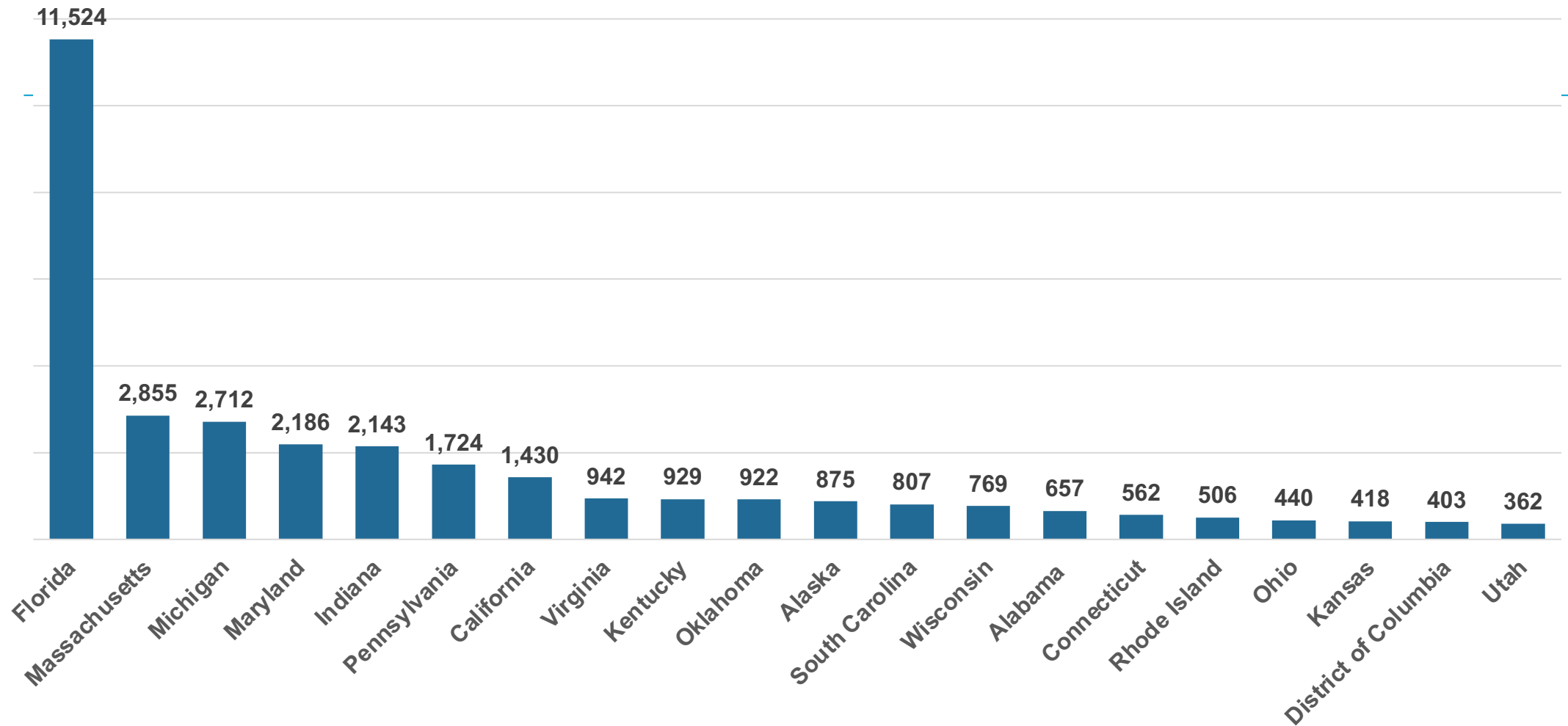
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Decrease in WIC Participation, February 2025 - February 2026: Top 20 States by Decline in Share of State Participation for Children (Ages 1-4)



Decrease in WIC Participation, February 2025 - February 2026: Top 20 States by Decline in Number of Children (Ages 1-4)



School Meals: Increasing Access in Many States

State	Notes
California	Provides free school breakfast and lunch to all K-12 students
Colorado	Offers public schools the option to provide universal free school breakfasts and lunches to all students.
Kentucky	Nutritionally balanced, free or reduced lunches. Some schools participate in the School Breakfast Program for free or reduced breakfast.
Maine	Public schools provide free school lunches and breakfasts.
Massachusetts	Permanent universal free school meal, funded by a new 4% tax on wealthiest residents.
Michigan	Up to \$160 million in state funds can be used for free lunch and breakfast for all public school students (regardless of family income).
Minnesota	Free breakfast and lunch to students at participating schools. (Schools that are eligible for meal reimbursement must be participants in the USDA's National School Lunch Program.)
New Mexico	universal free school meals
New York	School Meals passed for entire state in May 2025; Governor included it in the budget.
Vermont	Universal school meals

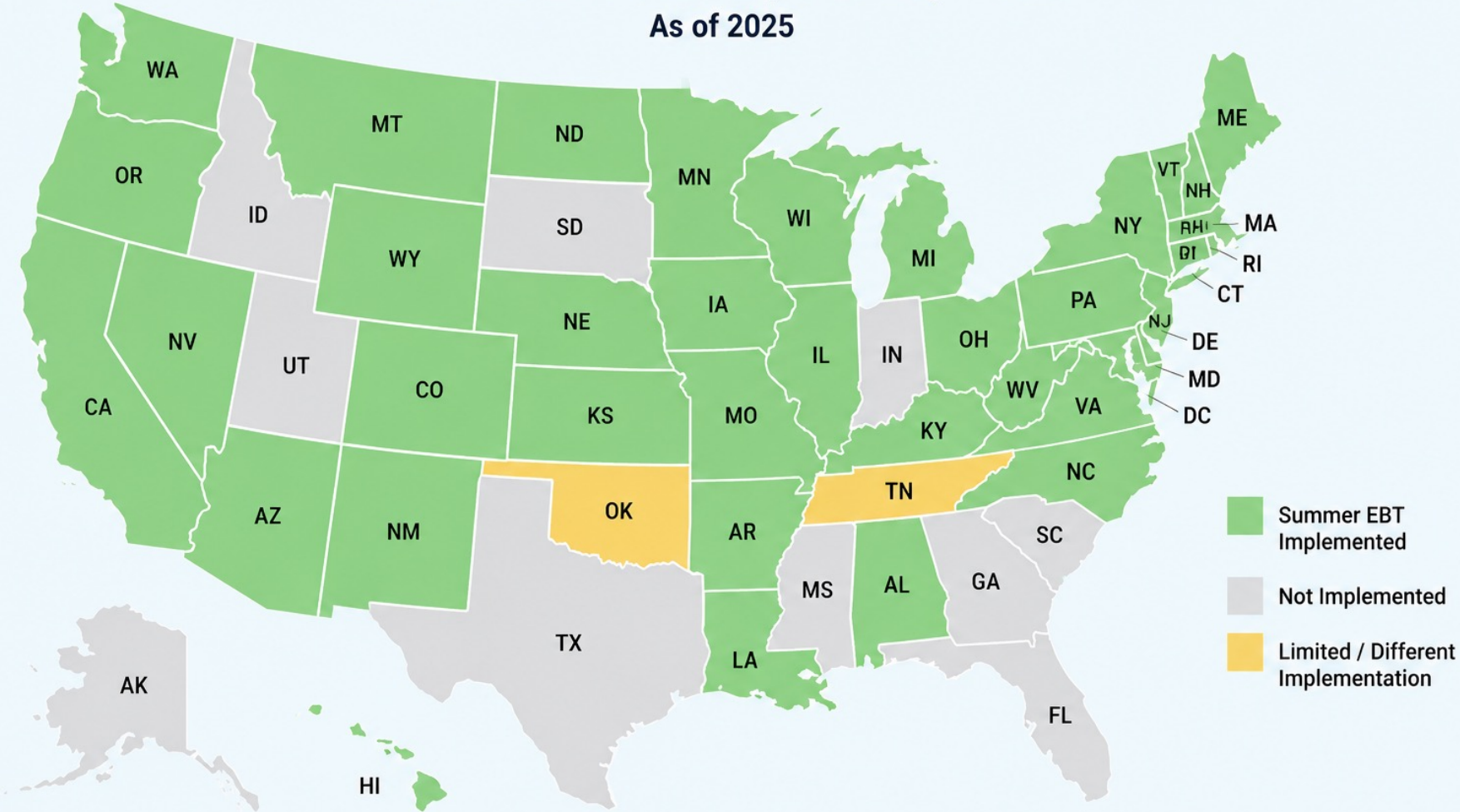


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Summer EBT Participation by State

As of 2025



Summer EBT Implemented (36 states + DC)
States in green are operating Summer EBT programs.

Not Implemented (11 states)
States in gray are not operating Summer EBT programs.

Limited / Different Implementation (2 states)
Oklahoma: Limited to some tribal locations
Tennessee: Not implemented in 2025. Starting in 2027, \$120 per child for eligible families.



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Administrative Challenges: School Meals and Summer EBT

Despite improvement in automation and data matching:

- 75% of School Food Authorities (SFAs) still collect household applications
- 50% rely on paper-based systems
- 33% use online applications

Thus, data-sharing between agencies remains inconsistent. “Even with direct certification, there are barriers to effectively match children that are eligible for these benefits.”

 **Participation data for children would be valuable in this time.**

Thank you for listening.

Please reach out with any additional questions to kchatfield@bankstreet.edu

Karen Chatfield, Director of Family Economic Security

Sydney Eltringham, Research Assistant



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Additional slides



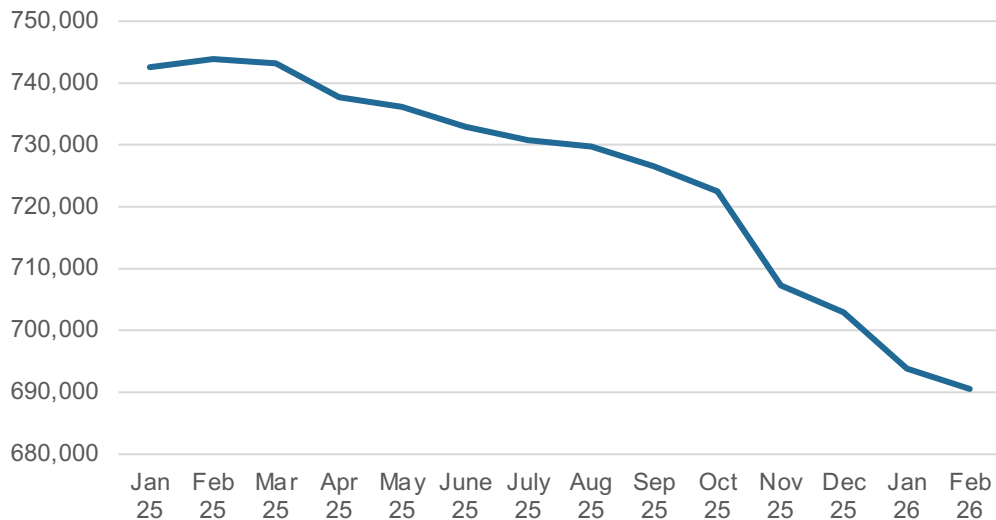
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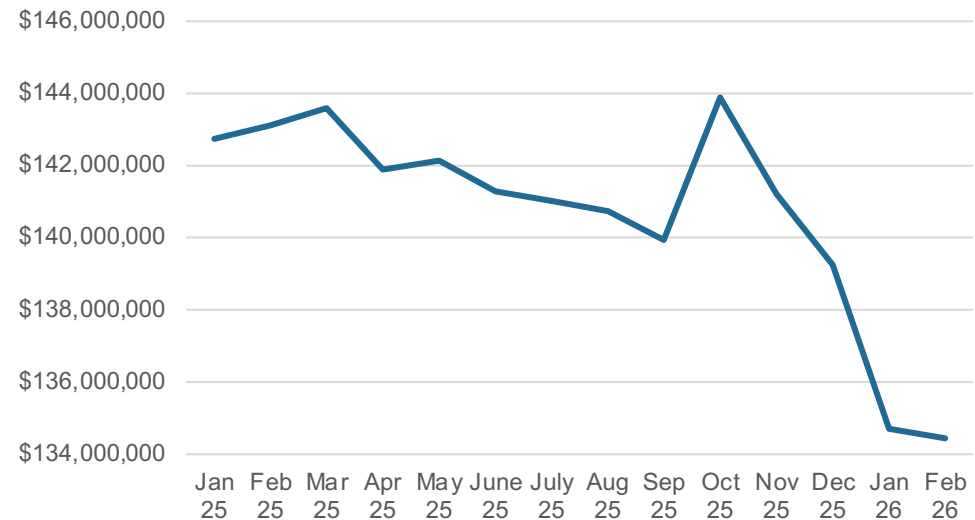
Alabama: Declines in Participation and Benefit Data (USDA data)

💡 Alabama increased recertification periods, from 12-month to 6-month recertification periods in November, 2025. It implemented changes to work requirements on March 1, 2026, and the “impact date” will be June 1, 2026.

7.0% Decline in SNAP Participants from Jan 2025 to Feb 2026

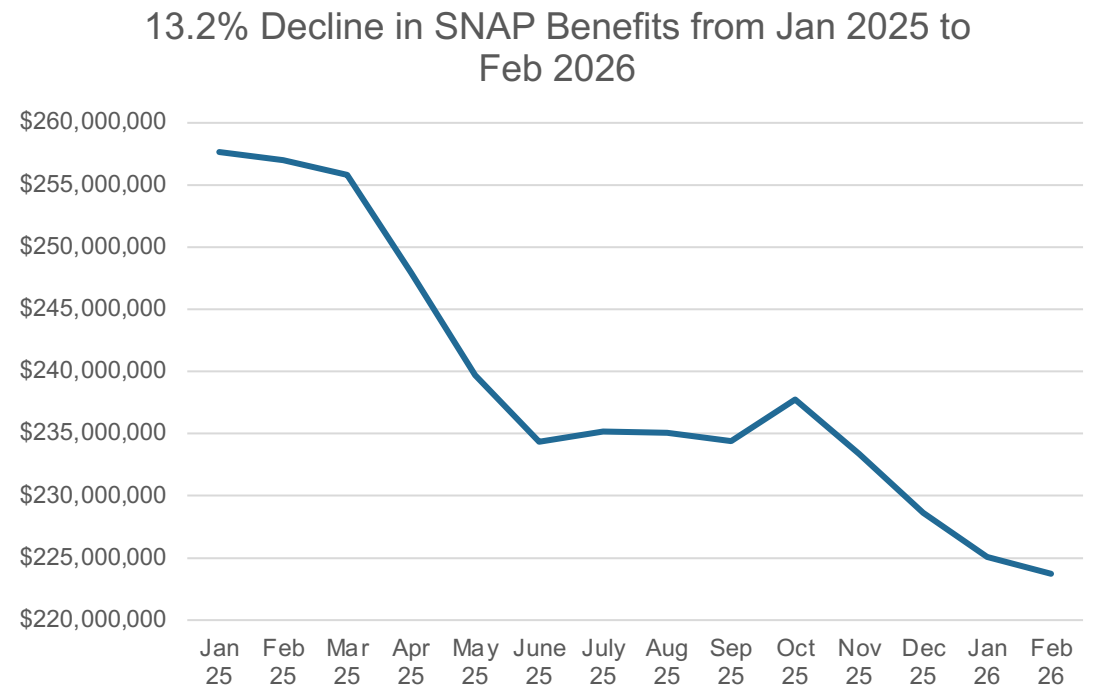
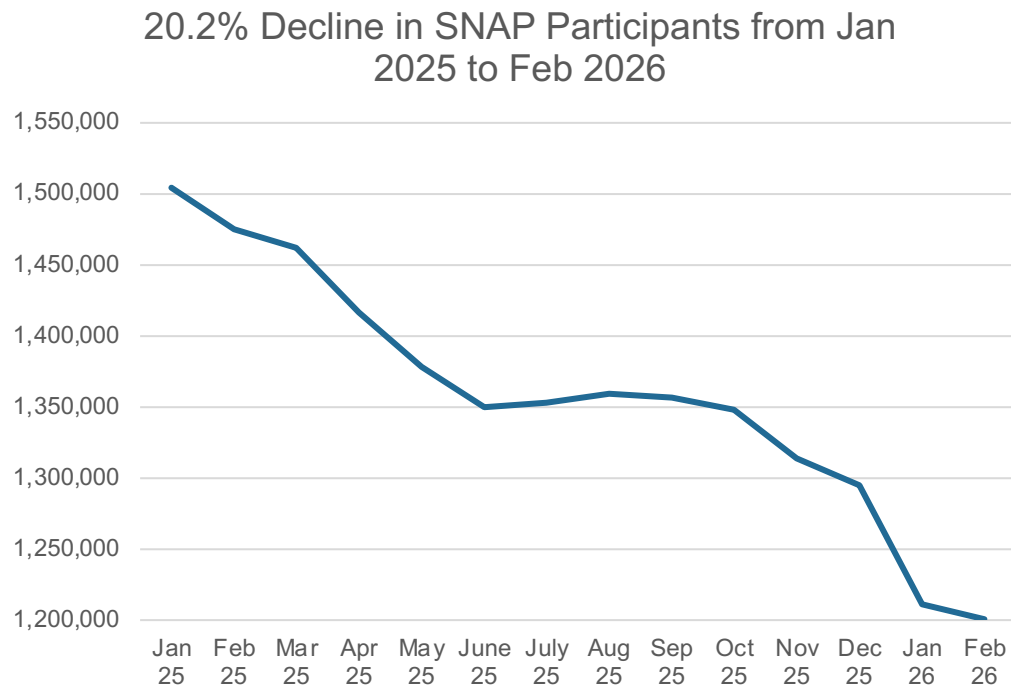


5.8% Decline in SNAP Benefits from Jan 2025 to Feb 2026



North Carolina: Declines in Participation and Benefit Data (USDA data)

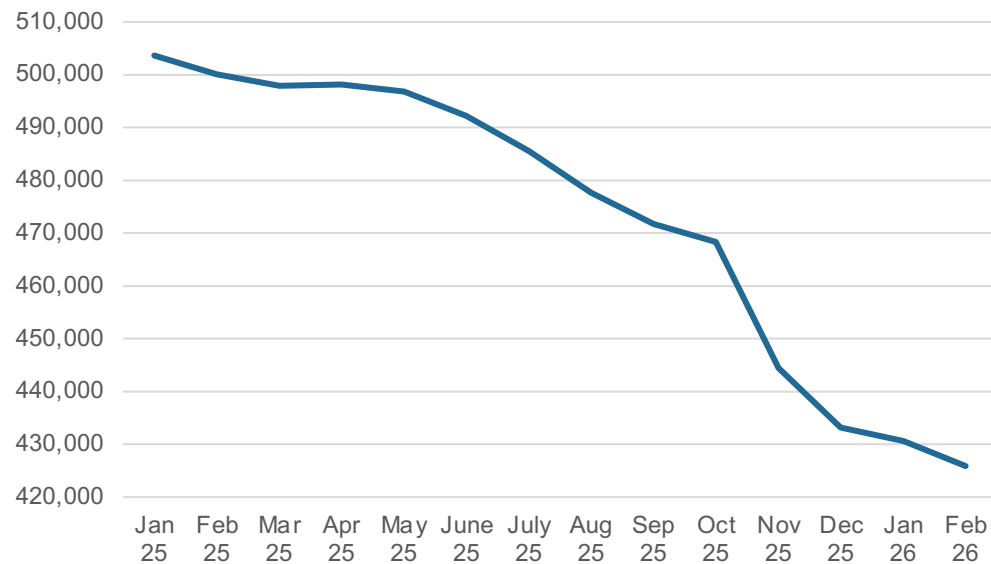
💡 North Carolina continues to provide SNAP to families with gross income as high as 200% FPL. The state implemented changes to work requirements on December 1, 2025, so the “impact date” was March 1, 2026.



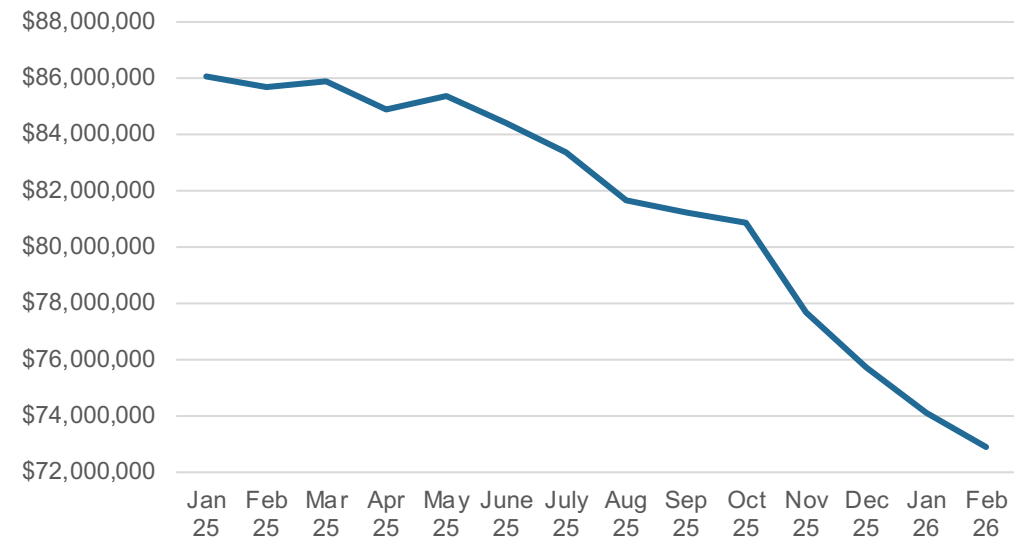
Nevada: Declines in Participation and Benefit Data (USDA data)

💡 Nevada continues to provide SNAP to families with gross income as high as 200% FPL, but has re-established an asset limit of \$3,000. Before HR1, no one in the state was responsible for ABAWD work requirements, but these were implemented on March, 2026.

15.4% Decline in SNAP Participants from Jan 2025 to Feb 2026



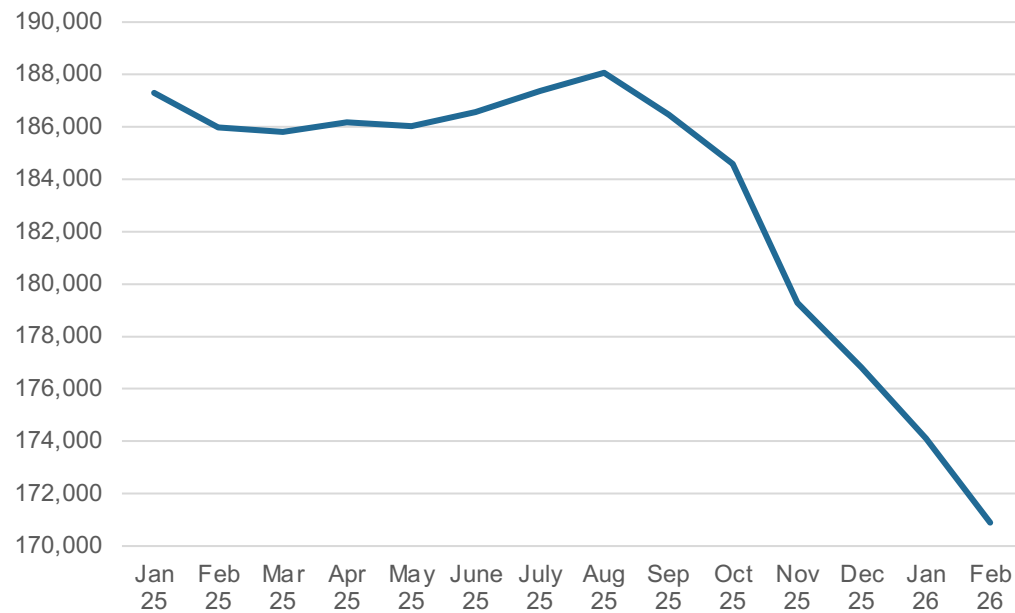
15.3% Decline in SNAP Benefits from Jan 2025 to Feb 2026



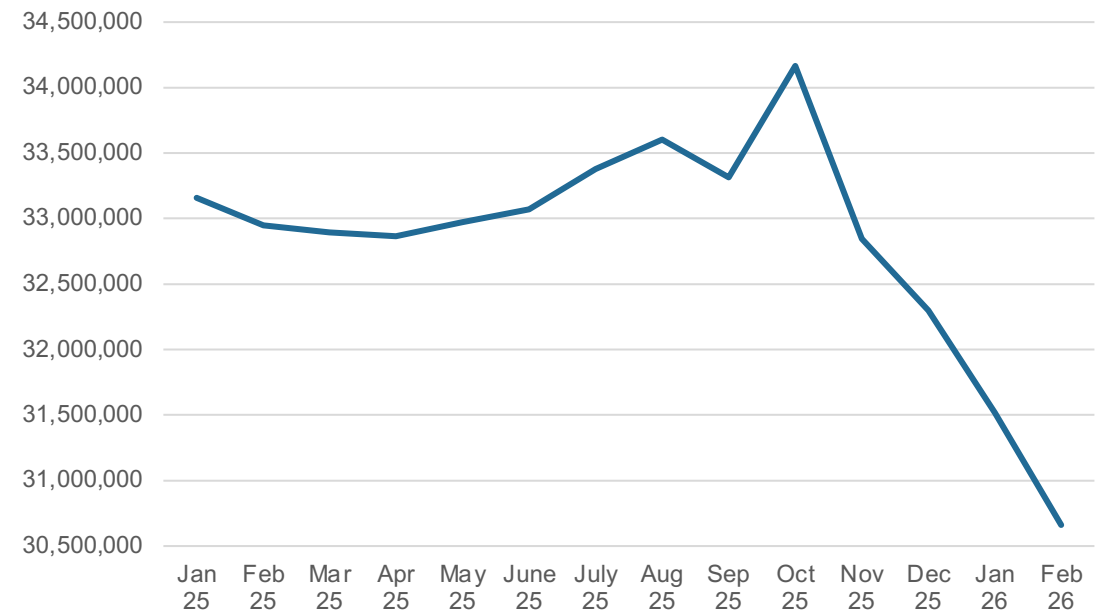
Kansas: Declines in Participation and Benefit Data (USDA data)

💡 Kansas continues to provide SNAP to families with gross income no greater than 130% FPL, and maintains an asset limit of \$3,000. The state implemented new guidelines for work requirements on November 1, 2026. **From 7/2025 through 4/2026, there has been a 12% drop in children's SNAP participation (not reflected in these data).**

8.8% Decline in SNAP Participants from Jan 2025 to Feb 2026

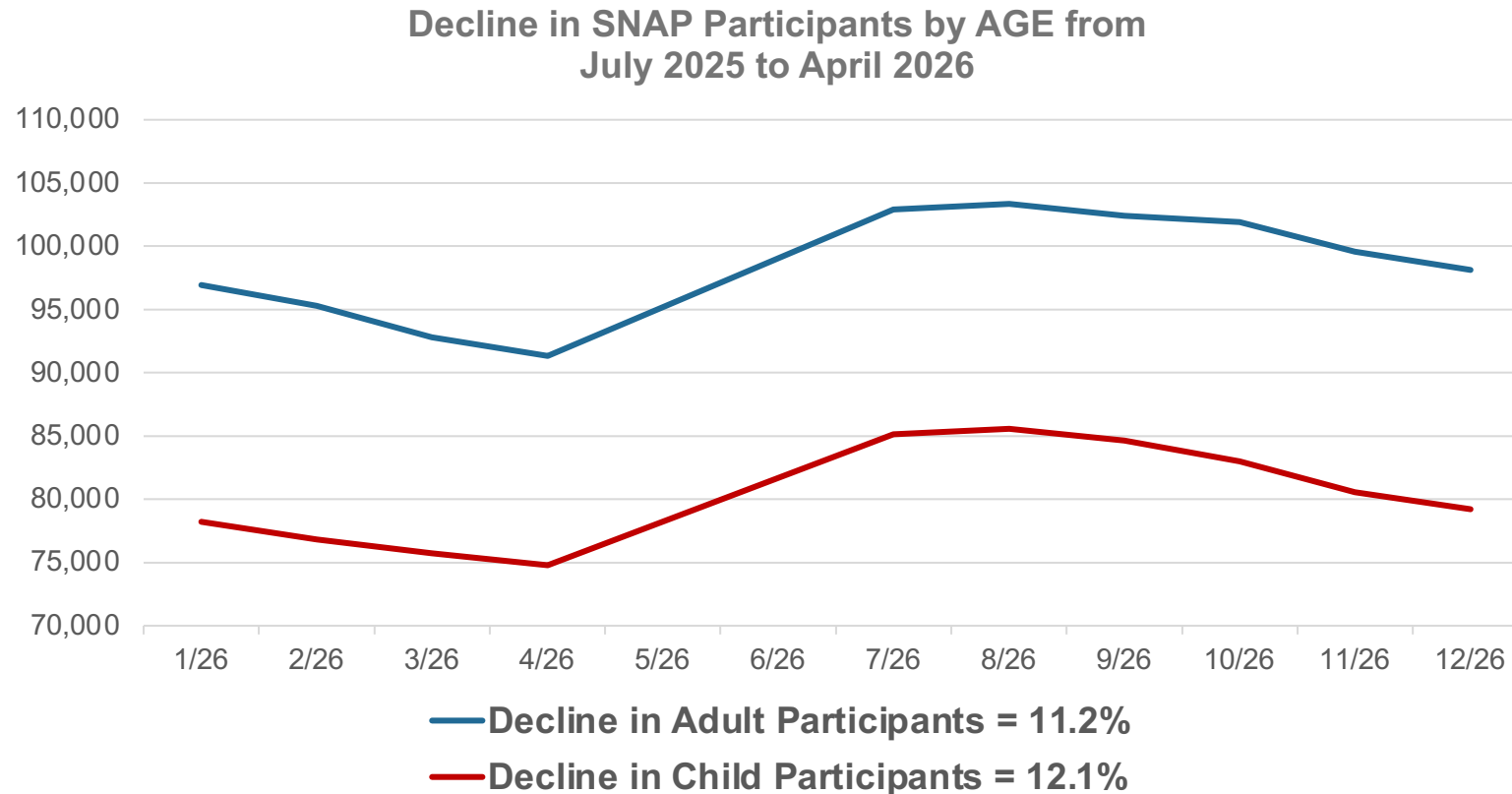


7.5% Decline in SNAP Benefits from Jan 2025 to Feb 2026



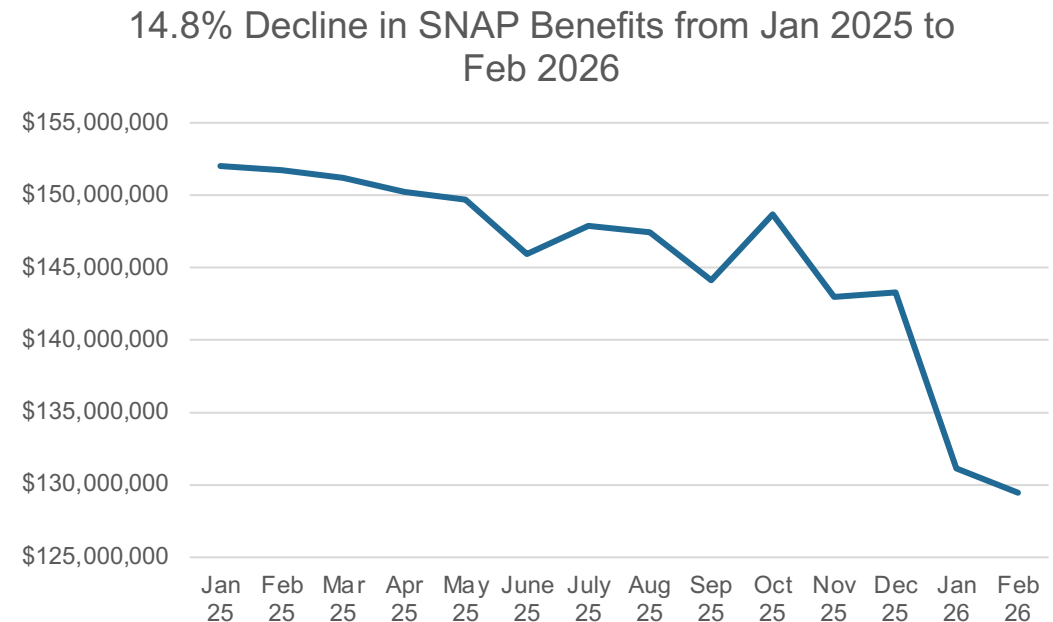
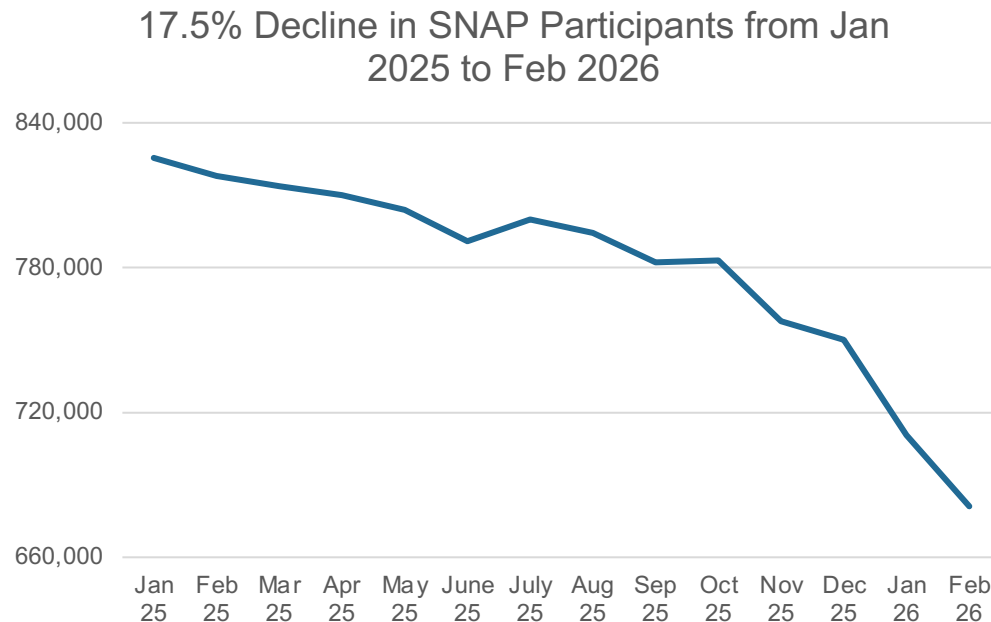
Kansas: Declines in Participation for Adults and Children

💡 The state provides publicly available data on participation by age of individuals from July 2025 to April, 2026.



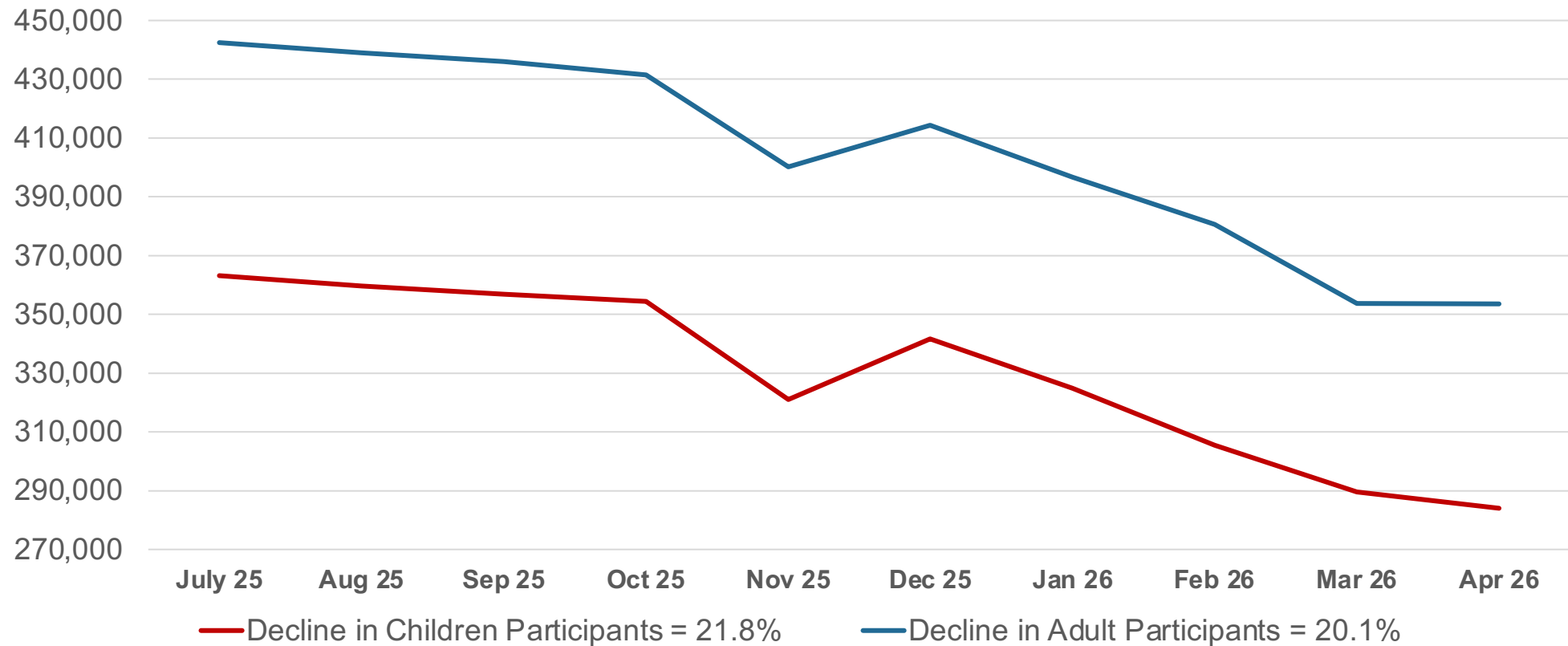
Louisiana: Declines in Participation and Benefit Data (USDA data)

💡 Louisiana continues to provide SNAP to families with gross income no greater than 200% FPL and imposes no asset limit. The state implemented new guidelines for work requirements on November 1, 2026. **From 7/2025 through 4/2026, there has been a 22% drop in children's SNAP participation (see next slide for data comparing declines for adults and children).**



Louisiana: Declines in Participation for Adults and Children

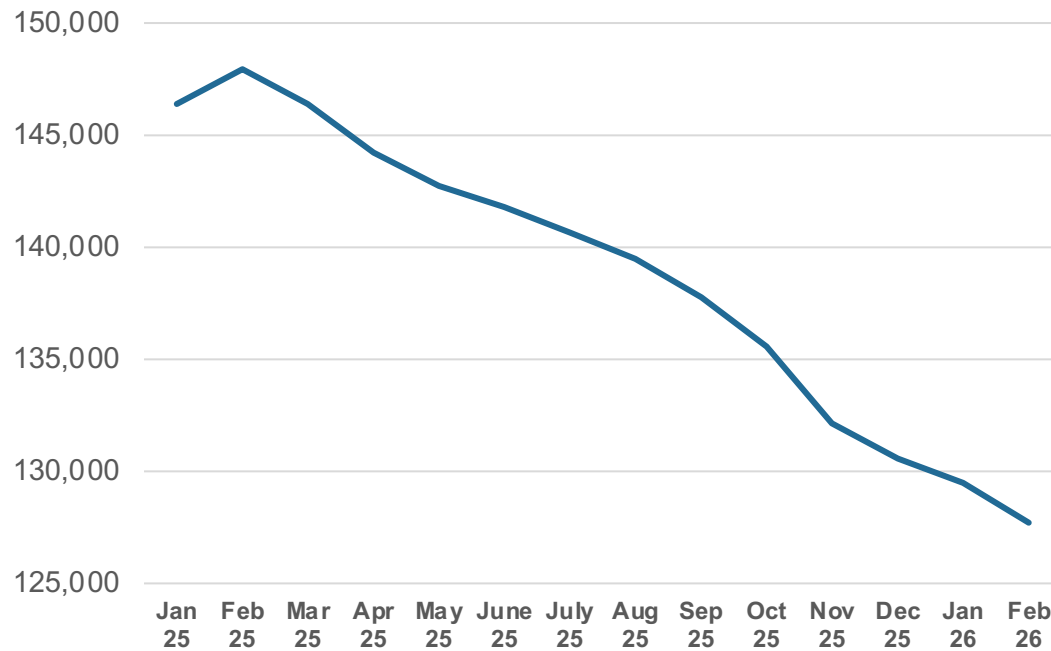
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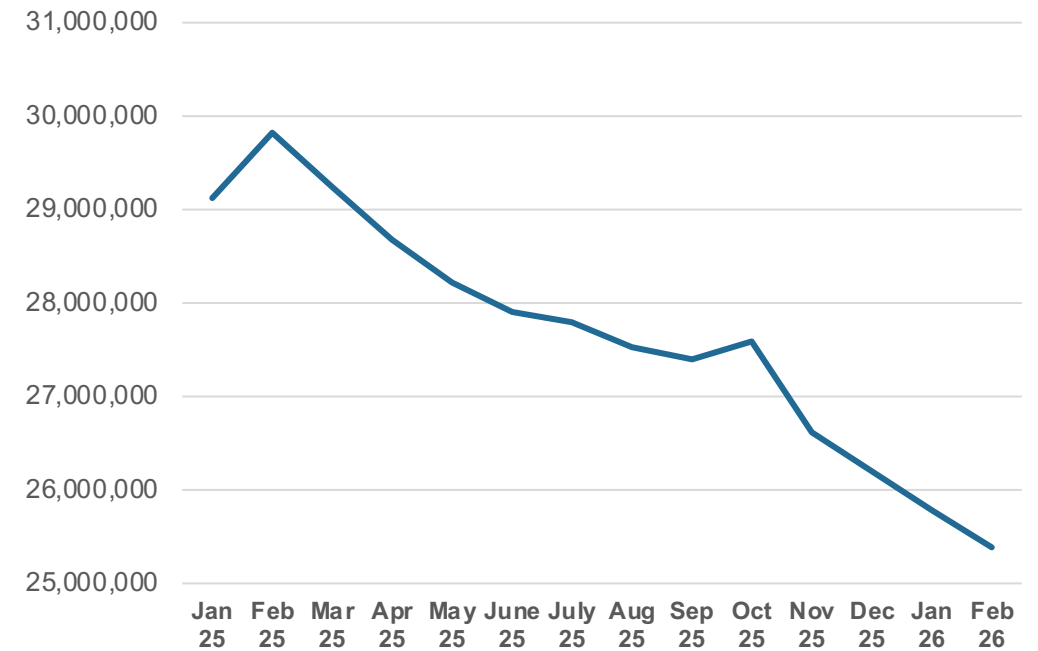
Rhode Island: Declines in Participation and Benefit Data (USDA data)

💡 Rhode Island continues to provide SNAP to families with gross income no greater than 185% FPL and imposes no asset limit. Recertification periods remain 12 months for most families, but an interim report is due every 6 months.

12.8% Decline in SNAP Participants from Jan 2025 to Feb 2026



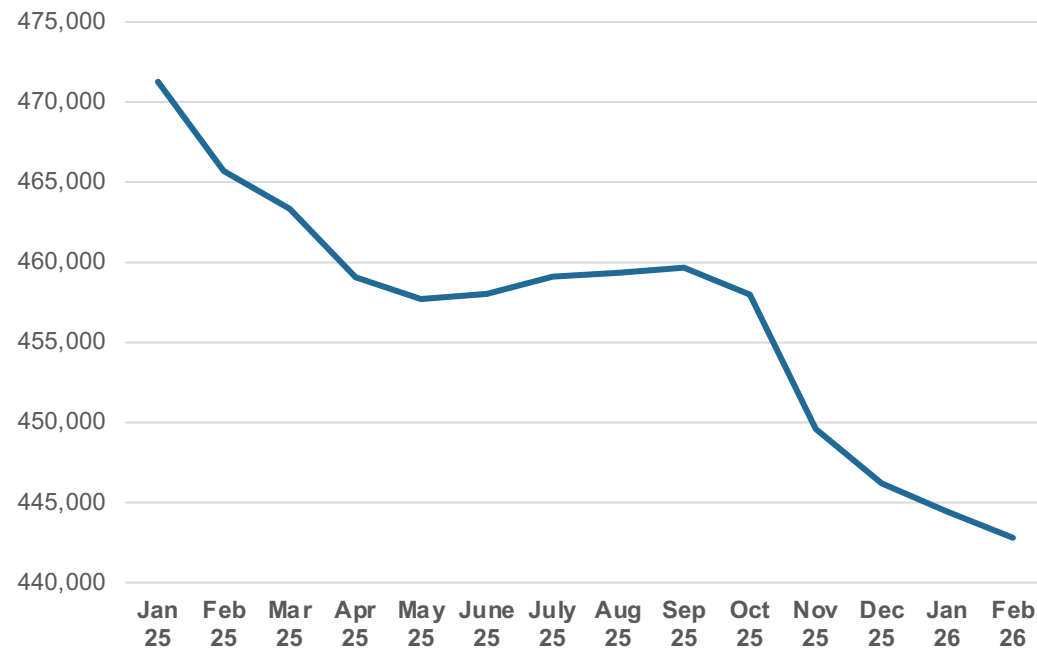
12.8% Decline in SNAP Benefits from Jan 2025 to Feb 2026



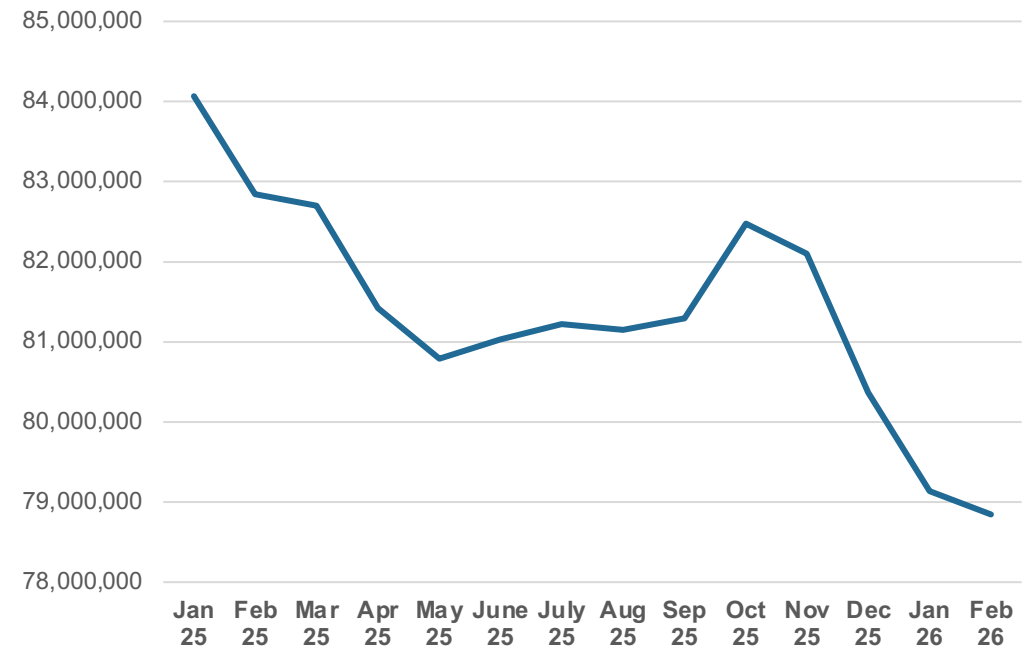
New Mexico: Declines in Participation and Benefit Data (USDA data)

💡 New Mexico continues to provide SNAP to families with gross income no greater than 185% FPL and imposes no asset limit. Recertification periods remain 12 months for most families, but an interim report is due every 6 months.

**6.0% Decline in SNAP Participants
from Jan 2025 to Feb 2026**



**6.21% Decline in SNAP Benefits
from Jan 2025 to Feb 2026**



Will states now be responsible for sharing both administrative and benefit costs? (from 11/25)

- States' share of **administrative** SNAP costs will increase from 50% (before OBBBA) to 75%, enabling a decrease in federal responsibility for these costs.
- Beginning in late 2027, the consequences for SNAP payment error rates over 6% will mean that states must be responsible for a share of **benefit** costs for the first time:
 - states with error rates **between 6% and 8%** will be responsible for **5% of benefit costs**;
 - those with rates **between 8% and 10%** will be responsible for **10% of costs**;
 - and those with rates **above 10%** will be responsible for **15% of costs**.

States will be able to choose whether to use their error rates for FY2025 or FY2026 to determine their cost-sharing responsibility.


What else is important to know about SNAP error rates and states' new cost-sharing requirements?

(from 11/25)

- Cost-sharing will “come on line” starting in late 2027, for FY2028.
- For FY2028, a state may elect either their FY2025 or FY2026 payment error rate to determine its benefit cost-sharing requirement.
- For FY2029 and each fiscal year thereafter, the state “match” for cost-sharing is calculated using the payment error rate that is three fiscal years prior.

Do some states get to delay benefit cost-sharing if their error rates exceed 13.34%? (from 11/25)

- Yes. In negotiations, a compromise was struck so that states with especially high error rates (for either 2025 or 2026) can defer the start of cost-sharing for SNAP benefits from 2028 to 2030.
- **Alaska, Florida, Georgia, Maryland, Massachusetts, New Jersey, New Mexico, New York, Oregon and D.C.** had error rates greater than 13.34% as of 2024. If their rates continue to be as high in 2025 or 2026, they will qualify for the two-year delay.

 **Some are interpreting this provision as an “incentive” to allow error rates to continue at high rates or even increase them in order to delay cost-sharing.** (Remember that all states will be able to choose whether to consider their 2025 or 2026 error rates.)