

Preliminary MLRI Analysis: SNAP Cuts Proposed by Congress, Harm to Massachusetts

The House Budget Reconciliation bill (H.R. 1) passed by the House early in the morning on [May 22](#)¹ and the Senate bill proposed by the Senate Agriculture Committee [on June 11](#) **would severely cut SNAP and harm millions of households - including 1 in 6 MA residents**. See Governor Healey's May 15 press release calling on Congress to reject SNAP cuts [here](#). The analysis below breaks down the various provisions of both bills and their impact on low-income Massachusetts households.

1. Dumps Federal Costs Onto States, Eviscerating SNAP's Effectiveness

Current law: Since the modern SNAP program (formerly known as Food Stamps) was created in 1977, state SNAP agencies have been responsible for 50% of the costs of administering SNAP. The federal government reimburses 50% of state administrative costs. SNAP benefits have been 100% federally funded. [See Appendix A for more information on the state cost requirement.](#)

| Section | House final bill: | Senate Ag proposed bill: |
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| Increased state administrative costs. House Bill Section 10007, Senate Bill Section 10106 | Starting immediately upon passage, states would be responsible for 75% of administrative costs. Harm: This cost dump would cut in half the federal funding DTA uses to pay and train SNAP case managers, update IT systems, do SNAP outreach, and make sure SNAP benefits are paid accurately and timely. For state fiscal year 2026, according to the Healey Administration , an additional 25% administrative responsibility would cost Massachusetts about \$53 million/year . If the 25% increase were to go into effect FFY2027 (during state fiscal year 2027) instead of immediately upon passage, MLRI expects the cost to Massachusetts would be similar to or slightly higher than FY2026 - approximately \$53 to \$60 million/year . | Same as the House bill, but pushes the start date to Federal Fiscal Year (FFY) 2027 (Oct. 1, 2026). |

¹ Statements on the House bill from MA organizations:

- [Massachusetts Law Reform Institute](#)
- [Mass Budget & Policy Center](#)
- [Children's HealthWatch](#)
- [Project Bread](#)

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| <p>State SNAP benefit cost requirement.</p> <p>House Bill Section 10006, Senate Bill Section 10105</p> | <p>Starting FY2028 (Oct. 1, 2027), all states would be required to pay 5% of SNAP benefits.</p> <p>If a state has a “payment error rate” of between 6 and 8% the state cost requirement increases to 15%. Between 8 and 10%, the state cost increases to 20%. If the error rate is 10% or higher, the state cost is 25%.</p> <p>The payment error rate is based on both underpayments and overpayments made in a sampling of SNAP cases. It is not a measure of fraud. The vast majority of payment errors are unintentional DTA worker and/or client mistakes.</p> <p>And, the House bill proposes making <i>all</i> under or overpayments pulled for the sample - even \$1 or \$2 mistakes - payment errors. Under current law, states exclude payment errors when the amount is \$57 or lower. This would artificially inflate the error rate. (More in Appendix A).</p> | <p>Starting FFY2028 (Oct. 1, 2027), states would be required to pay a share of SNAP benefits depending on the state’s payment error rate. Unlike the House, if the state’s payment error rate was below 6%, the state would not have to pay a percent of SNAP benefits.</p> <p>If a state has a payment error rate between 6 and 8% the state cost requirement would be 5%. Between 8 and 10% it increases to 10%. If the error rate is 10% or higher, the state cost is 15%.</p> <p>The Senate does not include the House’s \$0 payment error threshold.</p> |
| | <p>Harm: The House and Senate proposals are unprecedented structural changes that risk cutting billions of dollars of food assistance across the country and imposes significant costs on states. If a 5% state cost requirement were in place now in Massachusetts, according to the Healey Administration it would cost the state <u>\$131 million/year</u>.</p> <p>In FFY23 MA <u>had an error rate of 9.86%</u>.² If MA needed to provide:</p> <ul style="list-style-type: none"> ● 10% of SNAP benefits (Senate bill), it would cost about \$265 million/year. ● 20% of SNAP benefits (House bill), it would cost about \$529 million/year. <p>For context on the fiscal impact: In 2024 universal free school meals cost Massachusetts about \$180 million.</p> | |

² [In FFY23 the national average payment error rate was 11.68%](#). Most states had error rates higher than pre-pandemic levels due to unwinding from federal pandemic flexibilities. For nearly 20 years prior to COVID, MA’s error rate was consistently between about 3-5%. See Appendix A for more information.

2. Bars Thousands of Immigrants with Official Humanitarian Protections From SNAP

Current law: Most low-income legally present immigrants have long been eligible for federal SNAP benefits. The 1996 Welfare Reform Law narrowed SNAP eligibility to “qualified” immigrants who are Lawful Permanent Residents (LPRs) or have certain humanitarian protections, including refugees, those granted political asylum, immigrant survivors of domestic violence (VAWA petitioners), victims of labor or sex trafficking, and certain nationals of Cuba or Haiti with specific statuses. Federal SNAP law also imposes a 5 year waiting period on many LPRs, parolees, and battered/VAWA immigrants. The 2002 Farm Bill exempted LPR children and severely disabled LPR adults from the 5 year wait. Undocumented immigrants have *never* been eligible for SNAP, nor have immigrants with Temporary Protected Status, Deferred Action, or other non-qualified statuses.

| Section | House final bill: | Senate Ag proposed bill: |
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| House Bill Section 10012, Senate Bill Section 10108. | Immediately upon passage, the bill would bar from SNAP all immigrants who are not Lawful Permanent Residents (LPRs), certain Cuban entrants, or COFA citizens. Immigrants granted official humanitarian protections (refugees, asylees, etc) who have long been recognized as “qualified” for federal benefits would lose eligibility. | The Senate proposes the same bar as the House. |
| | Harm: This change is a stark departure from America’s long standing, bi-partisan commitment to people fleeing violence and persecution. MLRI projects this could harm 20,000 to 25,000 legally present immigrants residing in MA. ³ This policy change will also lower SNAP for U.S. citizen children living in immigrant households by reducing SNAP for the entire family. If 20,000 legally present immigrants were terminated from SNAP, at an average benefit of \$165 per person , MA would lose about \$40 million per year in federal food benefits. | |

3. Vastly Expands Failed Work Requirements (Time-Limited SNAP Benefits)

Current law on who must meet SNAP time limits: In 1996, Congress established the 3-month time limit in the Welfare Reform Act. Adults aged 18 to 55 are limited to 3 months of SNAP benefits in a 3 year period unless exempt from or meeting strict work requirements (these rules were suspended nationwide during the Great Recession and the COVID-19 pandemic). The 3 month time limit has never applied to parents/caretakers of children or adults over 54. From 1996 to 2023 it applied to adults ages 18 to 50. Congress expanded the time limit to include adults ages 50-54 in the Fiscal Responsibility Act of 2023 (FRA) and added

³ [USDA’s FFY23 Characteristics of SNAP households, Table B.16](#) identified that of the 1 million MA SNAP recipients, 974,000 are US born or naturalized citizens; 11,000 are refugees and 57,000 were “other non-citizens” include LPRs, asylees, humanitarian parolees, Cuban/Haitian entrants etc. USDA’s FFY23 report does not break down participation further.

specific exemptions for adults who are homeless, veterans, or former foster youth under age 24. Congress also sunset the expanded age range and new exemptions on October 1, 2030. [See Appendix B for more information on the time limit.](#)

| Section | House final bill: | Senate Ag proposed bill: |
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| <p>Expands the 3-month time limit.</p> <p>House Bill Section 10002, Senate Bill Section 10102.</p> | <p>Immediately upon passage, expands the time limit to include:</p> <ul style="list-style-type: none"> • Older adults until they turn age 65.⁴ • Parents, grandparents or other caregivers of children age 7 or older - regardless of whether parent/caregiver homeschools children or needs to be home for after school care or during school breaks. The House bill exempts caretakers if parents are legally married and one parent is meeting the work rules. <p>The House language would make the age and parent/grandparent expansions permanent. It would not make the FRA's three exemptions permanent - those would still sunset on October 1, 2030.</p> | <p>Immediately upon passage, expands the time limit to include:</p> <ul style="list-style-type: none"> • Older adults until they turn age 65. • Parents, grandparents or other caregivers of children age 10 or older. The Senate bill doesn't include the House's exemption for parents who are married to and living with an adult meeting the work rules. • Adults who are homeless (including homeless families if children are 10 or older). • Veterans. • Former foster youth. |
| | <p>Harm: According to the Center on Budget and Policy Priorities (CBPP), this bill would put about 230,000 MA residents - including older adults and children - at risk of losing some or all of their household's SNAP benefits (click here to see breakdown by state and also Congressional district). This group is about 25% of the Massachusetts SNAP caseload.</p> | <p>Harm: According to CBPP, the proposal would put about 176,000 MA residents in households with adults ages 55-64 or children 10 or older at risk of losing some or all of their household's SNAP. Because the Senate proposal would put veterans and homeless individuals/families at risk of termination (in addition to older adults and families with kids) MLRI estimates the Senate bill would put a total of approximately 200,000 MA residents at risk of losing some or all of their household's SNAP.⁵</p> |

⁴ In section 10008, the House bill would also expand the [general work rules](#) to include older adults ages 60 through 64.

⁵ DTA data from 2023 shows nearly 52,000 households on SNAP were homeless in Massachusetts. MLRI estimates at least half of these households may be subject to the time limit and at risk of termination.

Current law on geographic waivers: States can choose to request permission from USDA to waive the time limit for adults who live in areas of the state with elevated rates of unemployment based on certain unemployment data standards. Massachusetts has qualified for these waivers every year since 2009 (the time limit was also suspended nationwide due to the Great Recession and also during the COVID-19 pandemic). [Currently a number of Massachusetts cities and towns with elevated rates of unemployment are waived.](#) Every state in the country has elected this option in the past.

| Section | House final bill: | Senate Ag proposed bill: |
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| <p>Waiver option for areas with elevated rates of unemployment.</p> <p>House Bill Section 10003, Senate Bill Section 10102.</p> | <p>Immediately upon passage, the bill would severely restrict the options states have to waive the time limit in areas with elevated rates of unemployment.</p> <p>The bill would only allow states to choose to pursue this waiver if a county had an unemployment rate of over 10 percent.</p> <p>No county in MA currently has an unemployment rate over 10% (the highest rate by county in MA, in April 2025, was Nantucket County at 8.6%). But adults contend with elevated unemployment rates in many MA cities and towns.⁶ And, MA has 14 counties of varying geographic size. Within each county cities and towns face vastly different economic situations.</p> | <p>Like the House bill, the Senate would immediately upon passage severely restrict the option to waive the time limit in areas with elevated unemployment rates.</p> <p>The Senate bill would only allow states to choose to pursue a waiver if the USDA Secretary determines the area in which the individuals live has an unemployment rate of over 10 percent. The bill does not define “area.”</p> |
| | <p>Harm: Thousands of vulnerable MA adults would be at risk of losing SNAP if this proposal became law. In addition, this change would cause significant harm if the state experiences a recession or local economic downturn, but employment rates don’t meet the 10% threshold.</p> | |

Current law on discretionary months: DTA has an option called “discretionary months” it can use to selectively exempt individuals from the time limit for a single month at a time. Congress has repeatedly slashed this state tool - from 15 percent to 12 percent in the 2018 Farm Bill, and from 12 percent to 8 percent in the Fiscal Responsibility Act of 2023.

⁶ For example, the Department of Labor has 5 MA cities and towns listed as [Labor Surplus Areas](#) (meaning they had a two year unemployment rate of 6% or higher): Lawrence (6.4%), Provincetown (12%), Springfield (6.1%), Truro (8.3%), and Wellfleet (6.2%). Under current law, DTA can seek to waive the time limit in LSAs. Under the House bill, residents in all of these areas would be subject to the punitive rules, and likely be cut-off from SNAP despite facing a weak job market where they live.

| Section | House final bill: | Senate Ag proposed bill: |
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| House Bill Section 10003, not included in Senate Bill | <p>The House bill reduces this bucket from a number that equals 8 percent of the individuals required to meet the time limit rules to 1 percent.</p> <p>Harm: This would harm DTA's ability to selectively extend the time limit for certain vulnerable adults. For example, in the past - with the goal of ensuring participants could graduate with meaningful job skills - DTA applied these months to adults enrolled in a DTA employment and training program for less than 20 hours a week. A 1 percent pool would essentially eliminate this option for Massachusetts.</p> | Not included in the Senate bill. |

4. Cuts SNAP By Preventing Future Updates to Benefit Amount

Current law: In the 2018 Farm Bill, Congress directed USDA to re-evaluate the underlying food costs used for SNAP benefit amounts (the “Thrifty Food Plan” or TFP). As a result, in 2021 USDA updated the Thrifty Food Plan for the first time in 50 years. SNAP benefits are now based on scientific nutrition standards, modern food preparation, and food costs. [SNAP increased an average of \\$1.40/person/day.](#)

| Section | House final bill: | Senate Ag proposed bill: |
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| House Bill Section 10001, Senate Bill Section 10101. | <p>Would prohibit USDA from making future increases to the cost of the Thrifty Food Plan - essentially freezing SNAP benefit amounts outside of a cost of living adjustment, without regard for future changes to nutrition standards, food purchasing patterns, or systemic changes in food costs.</p> <p>Harm: SNAP grants are still too low. Across MA, on average the cost of a meal is 45% higher⁷ than the SNAP benefit. Prohibiting an increase to the Thrifty Food Plan will, over time, lead to SNAP grants that become more and more inadequate and out of step with modern life for low-income Massachusetts families. CBO says this would be a \$35 billion cut from 2027-2034 - roughly one day's worth of groceries per person a month (-\$7/mo). The amount of the cut would grow over time - cutting SNAP for every MA SNAP household in the future (currently, 1 in 6 residents - about 665,000 households - are on SNAP).</p> | The Senate proposes the same bar on increasing the cost of the Thrifty Food Plan (freezing SNAP benefit amounts outside of basic cost of living adjustments). |

⁷ [See Urban Institute analysis by county in Massachusetts.](#)

5. Narrows State Option to Calculate Utilities and Bars Internet Costs

Current law: Certain types of utility costs - including internet costs - count in the SNAP benefit calculation. Utility costs are calculated in a standard way (called a “Standard Utility Allowance”, or SUA). Massachusetts uses a state option in current federal law to simplify SUA administration for households who receive fuel assistance payments.

| Section | House final bill: | Senate Ag proposed bill: |
|--|---|---|
| Fuel assistance and SNAP utility costs. House Bill Section 10004, Senate Bill Section 10103. | <p>Immediately upon passage, receipt of a LIHEAP fuel assistance payment would no longer automatically qualify households for a Standard Utility Allowance (SUA) for households without an elderly or disabled member.</p> <p>Harm: Would increase administrative burdens for DTA and risk underpayments to eligible working families and other struggling households who can’t navigate the red tape involved in reporting specific utility costs. It may result in a SNAP cut for thousands of working families.</p> | <p>The Senate proposes the same cut as the House.</p> |
| Internet costs. House Bill Section 10005, Senate Bill Section 10104. | <p>After an extensive regulatory process, in 2024 USDA responded to extensive public comments by adding internet costs as a relevant part of the SUA. Federal and state agencies recognize internet access is critical in the modern world for low-income households to look for work and participate in school or training programs. The bill would eliminate this regulation improvement and prohibit states from counting internet costs in the SUA.</p> <p>Harm: Barring internet costs from impacting the SNAP math is a harmful and outdated approach that may cause a small SNAP cut for thousands of Massachusetts working families.</p> | <p>The Senate proposes the same cut as the House.</p> |

6. Eliminates SNAP Nutrition Education

Current law: DTA administers [a SNAP Nutrition Education program](#), connecting SNAP families to nutrition resources and services.

| Section | House final bill: | Senate Ag proposed bill: |
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| House Bill Section 10011, Senate Bill Section 10107. | Immediately upon passage eliminates the Nutrition education and obesity prevention grant program. | Eliminates the Nutrition education and obesity prevention grant program starting FFY2026 (Oct. 1, 2025). |
| | Harm: In FFY2025 DTA received \$9 million federal dollars for SNAP-Ed . The program would be eliminated. | |

7. Delays Benefits for Applicants Who Recently Moved Between States

Current law: Various federal laws prohibit duplicate issuance of SNAP benefits to a household in more than one state at a time.

| Section | House final bill: | Senate Ag proposed bill: |
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| House Bill 10009, not included in Senate bill. | <p>The bill may delay applicants who were getting SNAP in another state and moved from accessing other benefits the state SNAP agency administers.</p> <p>The bill does not address how to improve bureaucracy to make sure people who move can readily close their case in the state they left in order to open a new case in the state they moved to.</p> <p>Harm: This bill could prevent eligible Massachusetts residents from timely receiving TAFDC or EAEDC cash benefits in addition to SNAP - even after they have verified Massachusetts residency.</p> | Not included in the Senate bill. |

Appendix A: Impact of state cost requirements on Massachusetts

The House and Senate provisions imposing a state cost requirement is unprecedented and would harm SNAP's effectiveness for generations. SNAP benefits have been paid 100% by the federal government since the [modern program was created in 1977](#) - nearly 50 years ago. States pay 50% of administrative costs to run the program including paying case workers, doing training, and updating IT systems. The House and Senate bills could adversely impact the Commonwealth in multiple ways:

- **Undermines access and program integration:** Dumping SNAP benefit and administrative costs onto the state could force Massachusetts to cut funding for other human services priorities. And, because increasing enrollment would cost Massachusetts more money, a state cost requirement could harm the state's commitment to closing participation gaps and reaching eligible low-income households. For example, Massachusetts currently allows Medicaid (MassHealth) applicants to apply for SNAP at the same time and is actively working on a Common Application to integrate more benefits into a common application portal.
- **Harms SNAP's role as an economic stabilizer:** By requiring states to pay more when more households are on SNAP, a state cost requirement undercuts SNAP's essential role combating hunger and poverty (by disincentivizing enrollment). And, according to an analysis by the Urban Institute, because Massachusetts would need to pay more when households face financial strain and apply, a state cost dump would seriously constrain the ways SNAP [acts as a stabilizing force during recessions and economic downturns](#).
- **Increases administrative errors:** Requiring states to pay substantially more to administer the program (from 50% to 75%) could actually increase state payment error rates by FY28 (and in each year after).⁸ Federal disinvestment from SNAP administrative costs places significant pressure on states and *expands* the workload and capacity issues that cause mistakes, rather than reducing them.⁹ States may try to shrink their overall administrative costs to shoulder this burden. According to the National Council of State Legislatures¹⁰, this cost dump will likely translate into fewer case workers, fewer IT improvements, and worse customer service.

⁸ As explained in the table above, the payment error rate is based on both underpayments and overpayments made in a sampling of SNAP cases. It is not a measure of fraud. The vast majority of payment errors are unintentional DTA worker and/or client mistakes.

⁹ Currently, a state that has an elevated error rate that exceeds the national average by more than 105% for two consecutive fiscal years faces a fiscal sanction. Historically, when FNS applied a sanction ("error rate liability"), states were allowed to invest half the amount of the sanction into program improvements to reduce the error rate, and FNS waived the second half if the state successfully reduced its error rate. Charging states significantly more in a state cost requirement upends the incentive for states to make structural changes to address payment errors and, instead, incentivizes onerous requirements on recipients and restrictive eligibility rules.

¹⁰ See [NCLS letter to House Ag Committee](#), May 15, 2025.

Massachusetts is already struggling to meet the needs of Massachusetts residents. For example, in February, March, and April 2025 about 70% of calls trying to reach a SNAP worker were automatically disconnected due to high call volume.¹¹ Instead of cutting administrative resources, the federal government¹² and the Healey administration need to invest in adequate staffing and IT improvements to reach eligible households and reduce payment errors.

- **The House bill artificially inflates state payment error rates¹³:** The quality control (QC) payment error rate currently disregards overpayments and underpayments in the sampling at or below an “error tolerance threshold.” In FY25, the threshold amount is \$57. Starting FY26, the House bill would eliminate the threshold (by reducing it to \$0). This would mean that states with tiny errors (including \$1 or \$2 a month) would be exposed to a higher payment error rate. Running the QC system without a reasonable error tolerance threshold would divert significant state administrative resources to preventing miniscule math errors, ultimately costing more in administrative costs than the tiny under or overpayments - a foolhardy exercise since such errors do not reflect systemic problems. According to the American Public Human Services Association, the House proposal would artificially increase the error rate (and in turn increase the costs states like Massachusetts must pay towards SNAP benefits).¹⁴

Appendix B: Additional information on the vast expansion of SNAP work requirements

Time limits and harsh work rules are punitive, ineffective, and rely on red-tape barriers to exclude otherwise eligible low-income households. The House and Senate bills pursue the most drastic [expansion of SNAP Work Requirements \(SNAP time limit\)](#) since the time limit was created by the 1996 Welfare Reform law. According to a [detailed analysis](#) by Georgetown Law Review, decades of evidence show rules that condition eligibility for core assistance benefits on demonstrating compliance with work requirements do not improve employment - they only serve to block access.

The quest by Congressional Republicans to vastly expand SNAP work requirements would:

- **Ignore systemic barriers in the labor market** such as lack of training programs, affordable and accessible child care, and adequate transportation.
- **Impose work requirements on parents, grandparents and other caregivers** who need to supervise children after school and during school vacations and breaks. These rules fail to

¹¹ [DTA Performance Scorecards](#)

¹² To make matters worse, many USDA Food and Nutrition Service (FNS) staff with deep SNAP expertise were fired by the Trump Administration or took resignation packages. The loss of FNS technical expertise and competent oversight will further harm the ability of states and the federal government to work together and address the root cause of errors.

¹³ As noted above, the “payment error rate” is based on both underpayments and overpayments from a quality control (QC) sampling of SNAP cases. It is not a measure of fraud. The vast majority of payment errors are unintentional DTA worker and/or client mistakes while trying to navigate complex eligibility and reporting requirements.

¹⁴ [APHSA Testimony, May 13, 2025, to House and Senate Agriculture Committees.](#)

recognize the demands on parents who provide home schooling, provide child care after school or during breaks, or need to be home for a sick child. Most entry level or minimum wage jobs are not designed for caregivers and may force parents to leave very young children (ages 7 or older for the House bill and 10 or older for the Senate bill) unsupervised.

- **Takes food off the table for children:** Households with a disqualified member, like a parent, would receive a dramatically lower monthly food benefit - threatening food insecurity for the entire household. For the first time, Congress has proposed pushing this harm onto children. A family's food budget covers the whole family - not just those who remain on a SNAP grant.
- **Undermine recession readiness and responsiveness:** [As the Brookings Institution emphasizes,](#) vastly expanding the time limit while also harshly curtailing the options states have to waive the time limit when unemployment is elevated undermines SNAP's role in combating recessions and will ham workers during economic downturns.
- **Create massive red-tape and burden** that undermines employment and terminates SNAP for adults who should be exempt from the rules. In [DTA's 2018 comments to USDA](#) regarding proposed federal regulations on the SNAP ABAWD work rules, DTA noted that: *"Massachusetts' experience with the ABAWD authority and rules is that they pose a barrier to meaningful engagement with SNAP clients and require that Case Managers use their time trying to understand, communicate and comply with ABAWD rules rather than using their time to engage with clients, help them set meaningful employment goals and support them to find appropriate training and job readiness opportunities."*