

## MLRI Analysis: SNAP Cuts Passed by Republicans in Congress and President Trump, Harm to Massachusetts

The Budget Reconciliation bill (H.R. 1) [passed by Republicans in Congress and signed by President Trump on July 4, 2025](#) will severely cut SNAP and harm millions of households - including 1 in 6 MA residents.<sup>1</sup> See MLRI's statement on the final bill passage [here](#).

The analysis below breaks down the bill's provisions and their impact on low-income Massachusetts households. *Note this analysis is preliminary.*

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

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

Section	Final bill:
Increased state administrative costs.	<p>Starting Federal Fiscal Year (FFY) 2027 (Oct. 1, 2026), Massachusetts will be responsible for 75% of SNAP administrative costs.</p> <p><b>Harm:</b> This provision will cut in half (from 50% to 25%) the federal funding DTA receives to train and pay SNAP case managers, update IT systems, and ensure SNAP benefits are paid accurately/timely. It will also reduce to 25% the amount DTA reimburses SNAP outreach partners.</p> <p>For state fiscal year 2026, <a href="#">according to the Healey Administration</a>, an additional 25% administrative responsibility would cost Massachusetts about <a href="#">\$53 million/year</a>. For FFY2027 MLRI expects the cost to Massachusetts will be slightly higher than FY2026 - <b>approximately \$53 to \$60 million/year.</b></p>

<sup>1</sup> See Governor Healey's May 15 press release calling on Congress to reject SNAP cuts [here](#).

<b>State SNAP benefit cost requirement.</b>	<p>Starting FFY2028 (Oct. 1, 2027),<sup>2</sup> Massachusetts will be required to pay a share of SNAP benefits if the state’s payment error rate is 6% or higher.<sup>3</sup> Payment is required even if the payment error rate goes down below 6% in the years between the fiscal year with the error rate over 6% and the year payment is required.</p> <p>The payment error rate is based on <i>both</i> 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>If a state has a payment error rate between 6 and 8% the state cost requirement will 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><b>Harm:</b> This provision is an unprecedented structural change that risks cutting billions of dollars of food assistance across the country and imposes significant costs on states. Some states may stop - opt out of - SNAP entirely.</p> <p>In FFY24 MA <a href="#">had an error rate of 14.10%</a>.<sup>4</sup> Based on the current SNAP funds issued to MA families annually<sup>5</sup>, if MA needed to provide 15% of SNAP benefits, it would cost about <b>\$396 million/year</b>.</p> <p>For context on the fiscal impact: In 2024 universal free school meals cost Massachusetts about \$180 million.</p>
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## 2. Bars Thousands of Immigrants with Official Humanitarian Protections From SNAP

**History:** 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.

<sup>2</sup> The bill postpones this year until FFY2029 for states with payment error rates above 13.33% in FFY2025. The year is postponed until FFY2030 for states with error rates in FFY2026 above 13.33%.

<sup>3</sup> For FFY2028, Massachusetts will choose if it uses its FFY2025 or FFY2026 payment error rate (unless the implementation date is pushed to FFY2029 or FFY2030, see above). For FFY2029 and after, the state’s cost requirement will be based on the error rate for the fiscal year 3 years prior. For example, FFY2029 will be based on FFY2026 (published on June 30, 2027) - unless the implementation date is pushed to FFY2030, see above.

<sup>4</sup> [In FFY2024 the national average payment error rate was 10.93%](#). 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%. The FFY2024 error rate in MA, which is made up of both underpayments and overpayments - the vast majority of which are due to DTA worker mistakes or client mistakes - is elevated in large part because of staffing challenges and serious issues families faced in FFY24 and continue to face reaching DTA. DTA was provided additional resources to hire about [300 case workers in state fiscal year 2025](#). Investing in DTA case managers and IT and phone systems improvements has a direct relationship to improving the payment error rate. See Appendix A for more information on the state cost requirement and the payment error rate.

<sup>5</sup> Massachusetts receives about \$2.6 billion SNAP federal food dollars a year - calculated by annualizing the monthly SNAP benefits received by about 664,000 MA SNAP households. See [DTA’s most recent Performance Scorecard data](#).

Undocumented immigrants have *never* been eligible for SNAP, nor have immigrants with Temporary Protected Status, Deferred Action, or other non-qualified statuses.

**Final bill:**

Immediately upon passage, the bill bars from SNAP all immigrants who are not Lawful Permanent Residents (LPRs), certain Cuban/Haitian entrants, or COFA citizens. Immigrants granted official humanitarian protections (refugees, asylees, etc) who have long been recognized as “qualified” for federal benefits will lose eligibility.

**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 terminate from SNAP **about 20,000 to 25,000 legally present immigrants residing in MA.**<sup>6</sup> 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)***

**History of the time limit:** 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 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.](#)

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<sup>6</sup> [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.

## Final bill

Immediately upon passage, expands the time limit to permanently include:

- Older adults until they turn age 65.
- Parents, grandparents or other caregivers of children age 14 or older.
- Adults who are homeless (including homeless families if children are 14 or older).
- Veterans.
- Former foster youth.

The bill exempts some Native Americans.<sup>7</sup>

**Harm:** According to CBPP, the proposal will put about 103,000 MA residents in households with adults ages 55-64 or children 14 or older [at risk of losing some or all of their household's SNAP](#). Because the bill will also put veterans, former foster youth, and homeless individuals/families at risk of termination (in addition to older adults and families with kids) MLRI estimates the bill will put a total of approximately **150,000 MA residents at risk of losing some or all of their household's SNAP**.<sup>8</sup>

**History of 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). Every state in the country has elected this option in the past.

## Final Bill

The bill immediately upon passage severely restricts the option to waive the time limit in areas with elevated unemployment rates.<sup>9</sup> It only allows 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."

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<sup>7</sup> The bill allows only Alaska and Hawaii to ask USDA for permission to exempt people in their states from the time limit if the state met certain requirements, at most, until the end of 2028.

<sup>8</sup> 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. Our 150,000 estimate also includes an approximate number of veterans and former foster youth at risk of termination.

<sup>9</sup> The bill allows Alaska and Hawaii to ask USDA to waive the time limit if the state's unemployment rate was 1.5 times or more above the national unemployment rate. This waiver option is only for Alaska and Hawaii.

**Harm:** MLRI expects no areas of MA will qualify for a waiver under the bill's vastly limited criteria. Thousands of vulnerable MA adults who live in areas with weak job markets will be at risk of losing SNAP.<sup>10</sup> In addition, this change will cause significant harm if the state experiences a recession or local economic downturn, but employment rates don't meet the 10% threshold.

#### 4. Cuts SNAP By Preventing Future Updates to Benefit Amount

**History:** 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 about 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.](#)

##### Final bill

Prohibits 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.

**Harm:** SNAP grants are still too low. Across MA, on average the cost of a meal is [45% higher](#)<sup>11</sup> 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 will 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 will 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).

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

**History:** 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	Final bill
<b>Fuel assistance and SNAP utility costs.</b>	Immediately upon passage, receipt of a LIHEAP fuel assistance payment will no longer automatically qualify households for a Standard Utility Allowance (SUA) for households without an elderly or disabled member.

<sup>10</sup> 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 the bill, residents in all of these areas will likely be subject to the punitive rules, and face termination from SNAP despite facing a weak job market where they live.

<sup>11</sup> [See Urban Institute analysis by county in Massachusetts.](#)

	<b>Harm:</b> Will 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.
<b>Internet costs.</b>	After a thorough 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 eliminates this regulation improvement and prohibits states from counting internet costs in the SUA.
	<b>Harm:</b> 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.

## 6. Eliminates SNAP Nutrition Education

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

<b>Final bill</b>
Eliminates funding for the Nutrition education and obesity prevention grant program ("SNAP-Ed") starting FFY2026 (Oct. 1, 2025).
<b>Harm:</b> In FFY2025 DTA <a href="#">received \$9 million federal dollars for SNAP-Ed</a> . The program will be eliminated.

## Appendix A: Impact of state cost requirements on Massachusetts

The bill's imposition of a state cost requirement is unprecedented and will 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 bill 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 will 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).<sup>12</sup> 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.<sup>13</sup> States may try to shrink their overall administrative costs to shoulder this burden. According to the National Council of State Legislatures<sup>14</sup>, this cost dump will likely translate into fewer case workers, fewer IT improvements, and worse customer service.

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<sup>12</sup> 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.

<sup>13</sup> 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.

<sup>14</sup> 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.<sup>15</sup> Instead of cutting administrative resources, the federal government<sup>16</sup> and the Healey administration need to invest in adequate staffing and IT improvements to reach eligible households and reduce payment errors.

## 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 President and Republicans in Congress have passed the most drastic [expansion of SNAP's failed 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.

This vast expansion:

- **Ignores systemic barriers in the labor market** such as lack of training programs, affordable and accessible child care, and adequate transportation.
- **Imposes 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 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 children unsupervised.
- **Takes food off the table for children:** Households with a disqualified member, like a parent, receive a dramatically lower monthly food benefit - threatening food insecurity for the entire household. For the first time, Congress has pushed this harm onto children. A family's food budget covers the whole family - not just those who remain on a SNAP grant.
- **Undermines 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.
- **Creates 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*

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<sup>15</sup> [DTA Performance Scorecards](#)

<sup>16</sup> 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.



*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.”*