# H.R. 1‘One Big Beautiful Bill Act’ FAQ

***Last Updated: June 24, 2026***

*If you have questions, please reach out to your state agency that administers SNAP or Feeding America at policy@feedingamerica.org.*

**Background:** On July 4, 2025, budget reconciliation legislation called H.R 1, the “One Big Beautiful Bill Act” (OBBB) was signed into law. This new law contains the biggest cuts to the Supplemental Nutrition Assistance Program (SNAP) and Medicaid in a generation. Estimates show the law cuts nearly $200 billion from SNAP—realized through cost-shifting to states, eligibility restrictions, increased work requirements and limits on USDA’s ability to update benefit levels—and more than $900 billion from Medicaid. Feeding America estimates the final budget reconciliation legislation could take nearly 6 billion meals off the table for SNAP participants every year. For more information, see Feeding America’s analysis of OBBB.

Feeding America is committed to helping neighbors and the network navigate the implementation of this new law. This FAQ addresses questions about implementation, and it will be updated as more information becomes available. Importantly, USDA is expected to provide additional information on effective dates and the implementation of all SNAP provisions.

Read more: USDA OBBB guidance page (includes all policy memos related to the new law)

# H.R. 1 Implementation

## Timeline and Next Steps

**Question:** When will states implement the H.R.1 changes?

**Answer:** States will implement H.R.1 changes based on guidance provided by USDA and other federal agencies. Once state agencies receive guidance, they will be required to start implementing changes as their state’s systems allow them to do so. We recommend that you stay in close contact with your state’s administering agency as partners in SNAP accuracy, potentially collaborating on solutions to help reduce your state’s SNAP payment error rate.

Here are the details we have on the implementation timeline, as of May 28:

- **Effective upon enactment:**

    - New eligibility restrictions for noncitizens, including refugees, asylum seekers, and survivors of human trafficking
    - New limits on energy assistance
- **Fall/Winter 2025:** Expanded work requirements (dependent on your state)
    - **Nov. 2, 2025**: Termination of existing SNAP time-limit waivers; changes implemented subjecting more individuals to time limits
    - **Nov. 1, 2025:** Implementation of new exceptions for Native populations
- **Early 2026:** Individuals newly subject to time limits begin losing benefits
- **April 9, 2026**: Grace period for states' implementation for non-citizen guidance for SNAP ends
- **October 2026:** SNAP administrative cost-share for states increases from 50% to 75%
- **October 2027:** A portion of SNAP benefit costs shifts to states
- **Late 2027:** Restrictions on future Thrifty Food Plan adjustments

**Question:** What is the full extent of the possible impact of the bill and what does it mean for food banks?

**Answer:** All SNAP-related provisions of H.R.1 are likely to affect food banks, though the impact will vary depending on how each state implements the changes. Food banks may see increased demand in their service areas once new eligibility rules take effect, as some people will no longer qualify for SNAP. Some network members may also feel an earlier impact from the elimination of SNAP-Ed funding.

Beginning in federal fiscal year 2027 (which starts on Oct. 1, 2026), all states will face the SNAP administrative cost shift, which could reduce state funding available for network services, including partnerships with local farmers and growers.

Feeding America estimates that nearly 6 billion meals could be taken off the table for SNAP participants each year as a result of H.R. 1. (See the "Other Topics" section below for details on our estimate of meals lost.)

# SNAP Provisions

## SNAP Benefit Cost-Share with States

**Question:** What is the effective date for the SNAP benefit cost-share with states?

**Answer:** Currently, the federal government pays 100% of SNAP food benefit costs. This bill will require states to contribute up to 15% of the cost of SNAP food benefits beginning in federal fiscal year 2028 based on their payment error rates.

In federal fiscal year 2028 (Oct. 1, 2027), the first year of the matching funds requirement, each state can select either its FY25 or FY26 payment error rate to calculate the cost-shift requirement amount.

In FY29 and each fiscal year after, the state match is calculated using the payment error rate from three fiscal years prior. That means that the FY29 cost shift requirement will be based on error rates from FY26 and so on.

If a state is eligible for a temporary delay, implementation will begin in fiscal year 2029 (Oct. 1, 2028) or fiscal year 2030 (Oct. 1, 2029).

This bill allows states with high payment error rates in fiscal year 2025 or 2026 to delay the implementation of the SNAP benefit cost-shift. A state will qualify for this delay if its error rate, when multiplied by 1.5, is equal to or above 20% (which equates to an error rate of about 13.34%). If a state meets this threshold based on its fiscal year 2026 error rate, it may delay implementation until fiscal year 2030. Each state's experience will vary from year to year based on changes in SNAP error rate data.

| Example of FY25 SNAP Payment Error Thresholds | | |
|---|---|---|
| **SNAP Payment Error Rate Threshold** | **SNAP Benefit Cost-Share %** | **States, Based on FY25 Payment Error Rates (For example only; subject to change each year pending future error rates)** |
| < 6% | 0% | ID, IA, KY, NE, SD, UT, VT, WI, WY |
| 6% - 8% | 5% | NV, NJ, NC, OH, WA, WV |
| 8% - 10% | 10% | AL, AR, CT, IN, KS, LA, MI, MS, MO, MT, NH, ND, PA, SC, TN, TX |
| > 10% | 15% | AK, AZ, CA, CO, DE, DC, FL, GA, HI, IL, ME, MD, MA, MN, NM, NY, OK, OR, RI, VA |
| > 13.34% | 0% (Delayed Implementation FY28, FY29; then 15%) | AK, DE, DC, GA, IL, NM, OR |

*Please note that the category each state is in may vary year by year, depending on that state's payment error rate.*

Read more:
https://feedingamerica.sharepoint.com/:x:/r/sites/advocacy_Resources/_layouts/15/Doc.aspx?sourcedoc=%7B5DA036F1-7547-46CC-B4E4-C9605DDAA7D1%7D&file=FY25%20HR1%20SNAP%20Payment%20Error%20Rate%20%26%20Cost%

Watch Feeding America's SNAP Policy Training on SNAP Payment Error Rates

Feeding America's Analysis of Reconciliation Legislation "One Big, Beautiful Bill Act", H.R. 1

## SNAP Administrative Funds Cost-Share with States

**Question:** What is the effective date for the new SNAP administrative cost-share?

**UPDATED Answer:** Starting in federal fiscal year 2027 (Oct. 1, 2026), states must cover 75% of SNAP administrative costs, up from the previous 50%. However, **funding for Employment and Training (E&T) and Summer EBT will not be impacted by this cost shift.** The USDA will continue to reimburse states for 50% of E&T administrative costs. Additionally, Summer EBT is authorized separately from SNAP, and this change in administrative funding structure does not apply to the Summer EBT program.

**Question:** Will the new SNAP administrative cost-share impact SNAP outreach funding in my state?

**UPDATED Answer:** Yes. Federal reimbursement for outreach will be reduced from 50% to 25%. To confirm the full scope of how your SNAP outreach contract may be affected, please contact your state agency.

However, the increased administrative cost-share **does not impact activities on tribal lands**. Per existing federal regulation, FNS may continue to pay 75% of approved SNAP administrative costs to state agencies/organizations, including costs for outreach, fair hearings, and moving a certification or issuance center closer to a reservation. To learn if your state is maximizing the reimbursement for SNAP administrative costs for activities on tribal lands, we recommend contacting your state agency.

Read more: https://www.fns.usda.gov/obbb/snap/admin-cost-sharing-qas

## Expanded SNAP Employment Reporting Requirements and Waivers

**Question:** What is the effective date for the expanded SNAP employment reporting requirements documentation changes?

**Answer:** This provision took effect on Nov. 1, 2025, as stated in the USDA guidance. We recommend staying in close contact with your state's SNAP agency for the most up-to-date implementation information.

**Question:** Who is subject to the new SNAP time limits that are tied to work requirements?

**UPDATED Answer:** USDA clarified that individuals ages 60-64 who are newly subject to the time limit because of H.R. 1 are **exempt from the time limit if they qualify for an exemption to the general work requirements**. Such exemptions include caring for a child under age 6, caring for someone who is incapacitated, or receiving treatment for substance use. State agencies must screen for exemptions at certification and recertification.

When passed, H.R.1 increased the number of SNAP participants subject to time limits for certain so-called "able-bodied adults. USDA released an implementation memo regarding this provision on Oct. 3. For the first time ever, SNAP participants ages 55-64 (please note the explanation above related to participants 60-64 and the general work requirement), as well as parents of a school-age child age 14 or older, are subject to time limits. The USDA memo confirms the repeal of the exemptions and adds a time limit on benefits for veterans, individuals experiencing homelessness, and former foster care youth age 24 or younger. The memo also provides clarity on the exception for individuals who are an "Indian, or an Urban Indian, or a California Indian."

While these changes initially took effect on Nov. 1, 2025, federal government shutdown and the delayed release of November SNAP benefits resulted in the USDA instructing state agencies not to issue November as a countable month toward a time-limited participant's case/clock. Countable months toward the time limit now begin in December 2025.

We recommend staying in close contact with your state's SNAP agency as staff there work to implement these changes.

| PREVIOUS LAW | NEW LAW |
|---|---|
| Adults ages 18-54 able to work and without dependents were subject to all work requirements and time limits. | Narrows SNAP exceptions for work requirements for able-bodied adults and increases the age through which able-bodied adults must continue working to age 64. |
| Excused an individual from time limits if they had someone under 18 in their household. | Requires an individual to be subject to time limits if they have someone age 14 years or older in their household. |
| Excluded these groups from time limits:<br>• Veterans<br>• People experiencing homelessness<br>• People age 24 or younger and in foster care on their 18th birthday | Adds a time limit on benefits for:<br>• Veterans<br>• People experiencing homelessness<br>• People age 24 or younger and in foster care on their 18th birthday |
| | New exceptions from work requirements for "Indians, Urban Indians, California Indians" as defined by the Indian Health Care Act |

Additional resources: Time Limit Changes Q & A #1

Q & A on Quality Control Variance Exclusion

**Question:** How does USDA's new guidance on SNAP time limit waivers impact my state?

**Answer**: USDA released an implementation memo for state agencies on Oct. 3 related to SNAP time limit waivers: USDA ABAWD Waivers Implementation Memo. This type of waiver is also known as an ABAWD ("able-bodied adults without dependents") waiver. H.R. 1 changed the criteria upon which waivers are based and now requires that an area must have an unemployment rate of over 10% to qualify for a waiver, as discussed below in more detail.

State agencies can also no longer request a waiver for the entire state. Waiver requests must be specific to an area that meets one of the following criteria, according to Bureau of Labor Statistics data:

1. A recent 12-month average unemployment rate over 10%;
2. A recent three-month average unemployment rate over 10%; or,
3. A historical seasonal unemployment rate over 10%.

In its Oct. 3 memo, USDA announced that state agencies are encouraged to terminate active time limit waivers approved under the outdated "lack of sufficient jobs" criteria as soon as possible. USDA also said it would terminate any existing waivers still in place on Nov. 2, 2025. However, one of the court cases regarding the 2025 government shutdown's impact on November SNAP benefits also challenged the administration's Nov. 2 termination of SNAP time limit waivers across 18 states and territories. Barring any further legal action, USDA termination of these waivers has been reversed. This means **state waivers that extended past Nov. 2 will now run until their original expiration date**, unless a state terminated its waiver earlier than expected. The impacted states and territories and their reinstated waiver expiration dates are listed below. Please check with your state agency for details.

- Nov. 30, 2025: CT, KY
- Dec. 31, 2025: DC, NM, OR, VI
- Jan. 30, 2025: CA, IL, NJ, NV, WA
- Feb. 28, 2026: GU, MI, NY, RI
- June 30, 2026: MT, ND, MN

Also in its memo, USDA encourages states to fully implement work requirements and not seek any waivers, even in areas with high unemployment. States are reminded to screen each work registrant to determine if an applicant should be referred to the state's

SNAP employment and training (E&T) program, if appropriate for the state agency's criteria.

Hawaii and Alaska are eligible for a new exemption that allows the secretary of agriculture to approve requests to waive areas of Alaska and Hawaii with unemployment rates 150% above the national unemployment rate. Individuals in Hawaii and Alaska may be eligible for a "good faith exemption" if the state agency can demonstrate a good faith effort to comply with the work requirements. If approved, the state agency will need to submit quarterly progress reports. All good faith exemptions expire on **Dec. 31, 2028.**

We recommend staying in close contact with your state's SNAP agency as staff there work to implement these changes.

## SNAP Thrifty Food Plan

**Question:** What changes will be made to the Thrifty Food Plan?

**Answer:** This provision requires all future adjustments to the Thrifty Food Plan, beyond inflationary adjustments, to be "cost neutral." This means USDA will no longer have the authority to modernize the Thrifty Food Plan regularly to account for important factors beyond inflation that affect the cost of a frugal, nutritious diet. Such factors include changes in dietary guidelines, food consumption patterns and food preparation methods. Prior Thrifty Food Plan market basket reevaluations (like the 2021 reevaluation) are **not** rolled back by this provision.

**Question:** What is the effective date for Thrifty Food Plan changes?

This provision is effective upon enactment. Reevaluations of the Thrifty Food Plan market basket occur on a five-year schedule, with the next reevaluation scheduled for no earlier than Oct.1, 2027, the next no earlier than Oct. 1, 2032, and so on. The impact of this provision will be felt after the market basket reevaluation in 2027 and after all future five-year market basket reevaluations. Separately, the annual inflationary adjustment to the Thrifty Food Plan cost will continue each year. We are awaiting implementation details, which USDA is expected to provide soon.

**Question:** How does a cost neutrality requirement for the Thrifty Food Plan impact nutrition programs, like SNAP or TEFAP?

**Answer:** The USDA's Thrifty Food Plan estimates the minimum cost of a healthy diet. It determines benefit amounts for SNAP and SUN Bucks (Summer EBT) and impacts funding for TEFAP and the Nutrition Assistance Program (NAP).

The estimated cost of the Thrifty Food Plan changes month to month, based on average prices of foods and beverages, and reflect inflation. USDA calculates an annual Thrifty Food Plan food price inflation adjustment by using year-to-year, June-to-June monthly Thrifty Food Plan cost data. This calculation results in a percentage change data point.

> **TEFAP example:** Additionally, TEFAP entitlement funding receives an annual adjustment. By law (7 USC 2036), that adjustment reflects USDA's Thrifty Food Plan percentage adjustment. So, if the Thrifty Food Plan cost increases over the course of a year, TEFAP entitlement funding for that year will be adjusted and increased by the same percentage.
>
> In 2021, a reevaluation of the Thrifty Food Plan resulted in a meaningful cost adjustment (approximately a 21% increase). This modernization—the first in decades—led to an increase in SNAP benefits, as well as a $57.75 million increase in TEFAP entitlement funding in FY22.
>
> Restricting future Thrifty Food Plan adjustments to be cost-neutral means TEFAP entitlement funding adjustments will also be limited to reflect cost-neutral, inflation-only changes.

Other programs have funding structures tied to the Thrifty Food Plan. See the chart below for additional information:

| SNAP | TEFAP ENTITLEMENT FUNDING | SUN BUCKS (SUMMER EBT) | NUTRITION ASSISTANCE PROGRAM |
|---|---|---|---|
| Each year, USDA determines maximum SNAP benefit amounts using the cost of the Thrifty Food Plan. | USDA annually adjusts baseline TEFAP entitlement food funding levels by the same percentage as the annual adjustment to the Thrifty Food Plan. | USDA annually adjusts SUN Bucks benefit levels by the same percentage as the annual adjustment to the Thrifty Food Plan. | USDA annually adjusts block grant funding for Puerto Rico's Nutrition Assistance Program by the same percentage as the annual adjustment to the Thrifty Food Plan. |

## SNAP Nutrition Education (SNAP-Ed)

**Question:** What is the effective date for the SNAP-Ed funding elimination?

**Answer:** H.R. 1 eliminates funding for SNAP-Ed starting in federal fiscal year 2026 (Oct. 1, 2025). USDA's Food and Nutrition Service (FNS) is requesting state agencies provide notification of intent to close their federal fiscal year 2025 SNAP-Ed grant and return unexpended grant funding. State agencies that do not wish to terminate their remaining federal fiscal year 2025 SNAP-Ed funds must have submitted a state plan by Aug. 15, 2025, or no later than Aug. 31, 2025, if an extension was requested and approved. This should have included an intent to expend funds by Sept. 30, 2026.

Read more: https://www.fns.usda.gov/snap-ed/grant-qas

## SNAP Energy and Internet

**Question:** What changes will be made to SNAP energy and internet allowances?

**Answer:** These provisions limit the standard utility allowance (SUA) qualification to only households with elderly individuals or individuals with a disability. Household internet costs (such as monthly subscriber fees, recurring taxes and fees charged to the household, the cost of modem rentals, fees charged by the provider for initial installation and other related costs) can no longer be used to calculate the excess shelter deduction in determining the household SNAP allotments.

**Question:** What is the effective date for SNAP energy and internet restrictions?

**Answer:** These provisions are effective upon enactment. In USDA guidance linked below, Secretary of Agriculture Brooke Rollins has encouraged state agencies to use a simplified methodology (FY25 SUA values adjusted for the June-June changes in the consumer price index). States were supposed to be revising their SUA methodology before Oct. 1 to comply with regulations finalized by the Biden administration in January. H.R. 1 prohibits the inclusion of internet service costs, essentially blocking one aspect of that rule from being implemented. FNS will be "reviewing SNAP regulations pertaining to SUAs to determine changes necessary to comply with H.R.1." We recommend staying in close contact with your state's SNAP agency as it works on implementing this change.

Read more: USDA Guidance on Standard Utility Allowance
Treatment of Energy Assistance Payments Memorandum

Questions & Answers on Quality Control Variance Exclusion
Restrictions on Internet Expenses & Treatment of Energy Payments

## SNAP for Noncitizens

**Question:** What is the effective date for SNAP restrictions for noncitizens?

**Answer:** On December 15th, 2025, a preliminary injunction was issued by a federal judge in Oregon. This injunction bars the USDA from enforcing its guidance on non-citizens until **April 9, 2026.**

On April 14, the USDA released guidance for select states on quality control variance exclusion on non-citizen eligibility. The USDA says this guidance:

a) only applies to the 22 plaintiff states, and
b) the extended hold harmless period only applies from December 10, 2025 (or the state's actual implementation date, if later) through April 9, 2026.

Read more: https://www.fns.usda.gov/snap/qc/non-citizen-variance-exclusion-select-states

Related news article: USDA must give states more time to implement new food aid restrictions, judge rules – *Reuters* Dec. 15, 2025

**Question:** What groups of people are no longer eligible to receive SNAP, based on the provision eliminating SNAP for non-citizens?

**Answer**: This provision removes access to SNAP for refugees and asylum seekers, while also adding access for certain entrants from Cuba and Haiti, and U.S. residents who live in the Marshall Islands, Federated States of Micronesia and Palau.

| Eligible Groups Under H.R.1 | Eligibility Timing |
|---|---|
| • Non-citizen U.S. nationals<br>• Cuban and Haitian entrants<br>• Compacts of Free Association (COFA) citizens | Eligible immediately, with no waiting period, as long as they meet all other SNAP financial and non-financial eligibility requirements. |
| • Lawful permanent residents (LPR) (also known as Green Card holders) | Most are eligible immediately without 5-year waiting period, as long as they meet all other SNAP financial and non-financial eligibility requirements. |

| | |
|---|---|
| | LPRs may still be eligible for SNAP without a waiting period if they meet one or more of the following conditions:<br><br>• Are under 18 years old<br>• Have 40 qualifying work quarters<br>• Are blind or disabled<br>• Were lawfully residing in the U.S. and 65 or older on August 22, 1996<br>• Have a U.S. military connection<br>• Are admitted to the United States as an Amerasian immigrant<br>• Are an American Indian born abroad<br>• Certain Hmong or Highland Laotian tribal members |

Read more: USDA Guidance on SNAP Eligibility for Non Citizens and Non Citizen Eligibility Q & A #1

## Impact on SNAP Participants and Benefit Levels

**Question:** How many people will be impacted by H.R. 1 changes to SNAP?

**Answer:** The Congressional Budget Office (CBO) has released provision-specific estimates on the impact on SNAP participation. Ultimately, multiple provisions will result in a reduction to SNAP benefit levels, or a loss of SNAP benefits altogether, for millions of participants. Reductions to SNAP are also estimated to hold implications for funding and participation in other nutrition programs.

Participation

- **Work Requirements:** CBO estimates these provisions will reduce participation in SNAP by roughly **2.4 million people in an average month** over the 2025-2034 period.
    - Among the people who will no longer participate in the program:
        - About 800,000 will be able-bodied adults age 64 or younger who do not live with dependent children.
        - Another 300,000 will be able-bodied adults ages 18 to 64 who live with children who are age 14 or older.
        - Roughly 1 million will be able-bodied adults ages 18 to 54 (or 18 to 49, starting in 2031) who do not live with dependents but who

would have received a waiver from the work requirements (per CBO projections).
    - CBO estimates that the reductions in participation for veterans, people experiencing homelessness, and people ages 18 to 24 who were in foster care when they turned 18 will be partially offset by increases in participation among Native American individuals, resulting in a net reduction in SNAP participation of 300,000 people in those groups.
- **Cost-Shifting to States:** CBO expects that states collectively will reduce or eliminate SNAP benefits for about **300,000 people in an average month** over the 2028-2034 period.
    - CBO also estimates that in an average month, subsidies provided through child nutrition programs will **decrease for about 96,000** children over the 2028-2034 period.

Benefit Levels

- **Thrifty Food Plan:** CBO estimates that beginning in 2027, the average SNAP monthly benefit will be smaller than it would have been in CBO's January 2025 baseline projections. By 2034, that benefit will be $14 lower, $213 compared with $227 in the baseline projection for that year.
- **Standard Utility Allowance:** CBO expects that the monthly SNAP benefit will decrease by roughly $100 for about 3% of households, on average, in each year over the 2026-2034 period.
- **Restrictions on Internet Expenses:** CBO expects that the SNAP monthly benefit will decrease by about $10 for roughly 65% of households, on average, in each year over the 2026-2034 period.

Read more: https://www.cbo.gov/system/files/2025-08/61367-SNAP.pdf

# Medicaid Provisions

## Medicaid

**Question:** What is the effective date for Medicaid changes?

**Answer:** Implementation of work requirements as a condition of eligibility for individuals ages 19-64 applying for coverage or enrolled through the ACA expansion group will become effective at the end of calendar year 2026, at the latest. This provision requires eligible individuals to work or participate in qualifying activities for at least 80 hours per month and does not allow for this requirement to be waived, including under Section 1115 authority.

H.R.1 also limits federal matching payments for Emergency Medicaid for individuals who would otherwise be eligible for expansion coverage except for their immigration status to the state's regular Federal Medical Assistance Percentage (FMAP). This provision will become effective in January 2026.

Read more: Bill summary of Medicaid provisions from the Kaiser Family Foundation

**Question:** What is the full extent of changes to Medicaid?

**Answer:** Changes to Medicaid expansion funding, eligibility and provider taxes will cut Medicaid funding by more than $930 billion over 10 years. This is the largest cut in the program's history and will result in over 8 million people losing health insurance by 2034 due to Medicaid cuts alone.

Read more: Bill summary of Medicaid provisions from the Kaiser Family Foundation

# Other Topics

## Meals Lost

**Question:** How did Feeding America calculate the impact of "meals lost" as a result of H.R.1?

**Answer:** Feeding America estimates that H.R.1 could take nearly 6 billion meals off the table for SNAP participants every year. We have outlined the methodology used to calculate meals lost related to SNAP provisions in the final legislation.

As the legislative process unfolded, our estimate of meals at risk changed. The initial bill, as proposed in the House, could have resulted in about 9.5 billion meals lost for SNAP participants each year. However, as the bill was considered by the Senate, some of the proposals were altered or eliminated. Thanks to advocates like those in the Feeding America network, the final bill was less harmful than the originally proposed bill. This is reflected in our updated, final estimate of nearly 6 billion meals lost each year because of H.R.1.