

# The Restructuring of American Food Assistance: An Analysis of Trump Administration SNAP Policies (2017-2025)

## I. Executive Summary

This report provides a comprehensive analysis of the Trump administration's efforts to alter the Supplemental Nutrition Assistance Program (SNAP), charting a policy trajectory from its first term (2017-2021) through its second term (2025). The administration's actions demonstrate a persistent and evolving strategy to achieve three primary goals: 1) mandate and expand work requirements for a broader population of recipients; 2) reduce program enrollment and benefit costs, largely by restricting state-level administrative flexibility; and 3) shift the financial burden of the program from the federal government to the states.

The administration's first term was characterized by an attempt to achieve these goals via the federal rulemaking process. A three-pronged regulatory push in 2019 sought to tighten work requirements for Able-Bodied Adults Without Dependents (ABAWDs), curtail Broad-Based Categorical Eligibility (BBCE), and standardize Standard Utility Allowances (SUA). This effort ultimately failed, blocked by a combination of federal court rulings that found the new rules arbitrary and capricious<sup>1</sup>, and the subsequent, overriding legislative response to the COVID-19 pandemic.<sup>2</sup>

Learning from this procedural failure, the administration's second term pivoted to a more durable strategy: *legislative* change. On July 4, 2025, President Trump signed the "One Big Beautiful Bill Act" (OBBBA), Public Law 119-21, a budget reconciliation bill that successfully enacted the administration's long-standing SNAP agenda into statute.<sup>3</sup> The OBBBA's SNAP provisions (Title X, Subtitle A) represent the most significant restructuring of the program in decades.

This law:

1. **Expanded Work Requirements:** Increased the ABAWD age limit to 64, narrowed caregiver exemptions, and—most notably—eliminated long-standing exemptions for veterans, individuals experiencing homelessness, and former foster youth.<sup>4</sup>
2. **Eliminated State Flexibility:** Statutorily removed the "lack of sufficient jobs" criterion for states to waive work requirements, setting a rigid  $> 10\%$  unemployment floor.<sup>5</sup>
3. **Restricted Benefit Calculations:** Capped future re-evaluations of the Thrifty Food Plan (TFP) to prevent cost increases<sup>3</sup> and prohibited the use of internet costs in shelter deductions.<sup>6</sup>
4. **Cut Eligibility for Lawful Immigrants:** Removed SNAP eligibility for lawfully present groups, including refugees, asylees, and victims of trafficking.<sup>7</sup>
5. **Fundamentally Shifted Program Costs:** In a historic structural change, the OBBBA cuts the federal reimbursement for state administrative costs from  $50\%$  to  $25\%$ <sup>9</sup> and, for the first time, requires states to pay a portion ( $0-15\%$ ) of the *benefit* costs, tethered to their payment error rates.<sup>3</sup>

The implementation of this law collided with the 43-day government shutdown of October–November 2025, creating an unprecedented crisis. The administration's decision to withhold November SNAP funding<sup>10</sup> and its subsequent legal battles with states<sup>11</sup> culminated in a "patchwork" distribution of benefits.<sup>10</sup> The administration's issuance of an administrative "undo" memo—ordering states to reverse *full* benefit payments they had issued under a valid court order<sup>13</sup>—demonstrated a willingness to weaponize administrative chaos to enforce executive policy.

The OBBBA's changes, projected by the CBO to remove 2.4 million people from SNAP in an average month<sup>14</sup> and save \$279 billion over ten years<sup>15</sup>, have dismantled the program's role as an automatic economic stabilizer.<sup>14</sup> The law creates a new structural reality for states, imposing a contradictory mandate to implement complex, burdensome new rules while simultaneously cutting the federal funding designated to perform that work.<sup>9</sup>

## II. Background: The Policy Foundation of Term 1 (2017–2021)

The Trump administration's 2025 legislative victory in restructuring SNAP was the culmination of a policy agenda established in its first term. The initial strategy (2017–2021) relied on executive action and the federal rulemaking process, rather than new legislation, to achieve its goals.

## **The 2018 Executive Order and the "Work and Responsibility" Framework**

The administration's ideological framework was formally established on April 10, 2018, with Executive Order 13828, "Reducing Poverty in America by Promoting Opportunity and Economic Mobility".<sup>2</sup> This order directed federal agencies to review and enforce existing work requirements in all major public assistance programs, including SNAP. It established "work and responsibility" as the central tenets of the administration's welfare policy, signaling a clear intent to move beyond the existing statutory framework and aggressively enforce provisions that, in its view, promoted self-sufficiency.<sup>2</sup> This executive order set the stage for a three-pronged regulatory assault in 2019.

## **The Three-Pronged Regulatory Push of 2019**

Unable or unwilling to pursue these changes through a divided Congress, the administration leveraged the U.S. Department of Agriculture (USDA) and its rulemaking authority to reinterpret the Food and Nutrition Act.

### **1. Restricting ABAWD Time-Limit Waivers**

The administration's primary target was the set of rules governing Able-Bodied Adults Without Dependents (ABAWDs)—individuals aged 18-49 without dependents, who are limited to three months of SNAP benefits in a 36-month period unless they meet a work requirement. The statute, however, allowed states to request waivers from this time limit for areas with high unemployment or a "lack of sufficient jobs".<sup>1</sup>

On December 5, 2019, the USDA's Food and Nutrition Service (FNS) published a final rule that severely restricted state flexibility in applying for these waivers.<sup>1</sup> The rule revised the conditions for waivers, limiting them to areas with an unemployment rate over 10 percent and eliminating the "lack of sufficient jobs" justification that states frequently used.<sup>1</sup> The proposed rule had even floated a 7 percent unemployment floor within the 20 percent standard, signaling a clear intent to dramatically curtail the use of waivers.<sup>16</sup> This was a direct attempt to force states to subject more individuals to the three-month time limit, thereby reducing program rolls.<sup>2</sup>

### **2. Limiting Broad-Based Categorical Eligibility (BBCE)**

In July 2019, the USDA proposed a second rule to end or severely limit states' use of Broad-Based Categorical Eligibility (BBCE).<sup>17</sup> BBCE is a policy option that allows states to

make households "categorically eligible" for SNAP if they receive a nominal benefit from a TANF-funded program (Temporary Assistance for Needy Families). This streamlined the application process, reduced state administrative costs 20, and allowed households to have slightly more income or assets (like a car) than federal SNAP rules would otherwise permit. The administration's proposed rule sought to redefine the "benefits" that could confer this eligibility.<sup>21</sup> It argued that non-cash TANF benefits, such as an informational brochure or a hotline number, did not represent a robust eligibility determination.<sup>17</sup> The proposal would have required TANF benefits to be "ongoing and substantial," such as subsidized employment or childcare, with a minimum value of \$50 per month, to confer SNAP eligibility.<sup>17</sup> The administration's stated justification was to improve "program integrity" and ensure consistency across states.<sup>17</sup>

### 3. Standardizing Utility Allowances (SUA)

In October 2019, the administration published a third proposed rule to standardize the methodology for calculating Standard Utility Allowances (SUAs).<sup>22</sup> SUAs are a critical, non-discretionary part of the SNAP benefit formula, allowing households to deduct an average utility cost from their income to determine their net income and, thus, their benefit amount. The proposed rule would have set a national standard for these calculations, a move critics argued was a thinly veiled attempt to lower the allowed deduction for many households, thereby reducing their monthly benefit amount.<sup>22</sup>

## Judicial and Legislative Stalemate

This first-term regulatory agenda failed.

- **Legal Defeat:** The 2019 ABAWD final rule was immediately challenged by a coalition of 14 states, the District of Columbia, and New York City.<sup>1</sup> On October 18, 2020, the U.S. District Court for the District of Columbia *vacated* the rule, finding that the USDA's action was "arbitrary and capricious" and that it had failed to justify its policy change.<sup>1</sup>
- **Policy Withdrawal:** The proposed BBCE rule faced overwhelming public opposition and was formally withdrawn by the subsequent administration on June 9, 2021.<sup>21</sup>
- **COVID-19 Intervention:** The entire debate around ABAWD work requirements was rendered temporarily moot when President Trump signed the Families First Coronavirus Response Act on March 18, 2020. This law suspended the ABAWD time limits nationwide for the duration of the public health emergency, underscoring that Congress, not the executive branch, held ultimate authority over the provision.<sup>2</sup>

The administration's first-term failure was fundamentally a procedural one. It attempted to use the administrative rulemaking process to enact sweeping policy changes that exceeded the authority granted by the Food and Nutrition Act, and the judiciary blocked this overreach.<sup>1</sup> This procedural failure is the *direct cause* of the second-term *legislative* strategy. To achieve

its policy goals, the administration learned it could not merely reinterpret the law; it would have to rewrite the law itself.

### **III. The 2025 Context: SNAP Program Landscape**

The administration's second-term actions occurred within a new programmatic and economic context. By 2025, SNAP enrollment and costs had stabilized at a new, higher baseline following the COVID-19 pandemic and a period of high inflation.

#### **Program Scale: Participation and Cost**

In Fiscal Year (FY) 2024, SNAP served an average of 41.7 million participants per month, or 12.3 percent of the U.S. population.<sup>24</sup> Total federal spending for the program in FY 2024 was \$99.8 billion.<sup>24</sup> The average monthly benefit per participant was \$187.20.<sup>24</sup>

As of May 2025, program enrollment held steady at approximately 42 million individuals, or roughly 1 in 8 Americans.<sup>26</sup> The Congressional Budget Office (CBO), in its January 2025 baseline, projected that SNAP outlays would total \$109.6 billion in FY 2025 for an average of 42.5 million participants.<sup>30</sup>

#### **CBO Baseline and Economic Context**

This new, higher cost baseline was a subject of intense policy debate. It was largely driven by two factors: the previous administration's 2021 re-evaluation of the Thrifty Food Plan (TFP), which statutorily increased the purchasing power of benefits, and persistently high food price inflation.<sup>31</sup> The CBO projected that SNAP's total costs from 2025 to 2031 would be \$257 billion *higher* than it had estimated in 2021, primarily due to these two factors.<sup>31</sup>

This fiscal reality became a primary, if less publicized, target of the 2025 legislation. While the administration's public-facing justifications centered on "work," its legislative vehicle, the OBBBA, included a provision (Sec. 10101) directly targeting the TFP. This provision amends the Food and Nutrition Act to limit future re-evaluations from *increasing* the TFP's cost,

effectively freezing its real value and "clawing back" a key policy of the prior administration.<sup>3</sup>

This fiscal and programmatic landscape was set against a backdrop of a cooling, but not recessionary, economy. The CBO projected an unemployment rate of 4.5 percent for the fourth quarter of 2025 and an inflation rate of 3.1 percent.<sup>32</sup> This economic data is critical, as it demonstrates the administration was imposing severe work requirements and restricting state waivers to a  $\$ > 10\%$  unemployment standard<sup>5</sup> in an environment that was nowhere near that crisis-level threshold.

## IV. Legislative Overhaul: The "One Big Beautiful Bill Act of 2025" (OBBBA)

On July 4, 2025, President Trump signed into law the "One Big Beautiful Bill Act of 2025" (OBBBA), Public Law 119-21.<sup>3</sup> Passed as H.R. 1, a budget reconciliation law, the bill was insulated from a Democratic filibuster in the Senate, where it passed on a narrow 51-50 vote with Vice President Vance casting the tie-breaking vote.<sup>34</sup> The law combined massive tax cuts<sup>35</sup> with deep, structural cuts to domestic programs, including SNAP and Medicaid.<sup>37</sup>

The administration's justification for the SNAP provisions (Title X, Subtitle A) was to "restore the dignity of work," promoting "commonsense, Clinton-era work" requirements<sup>39</sup>, and to enhance "program integrity".<sup>4</sup> In reality, the law served as a vehicle to resurrect and successfully enact the very policies that had failed in federal court and public opinion during the administration's first term.

The table below illustrates the direct line of policy continuity, showing how the failed 2019 regulatory proposals were reborn as successful 2025 statutory provisions.

**Table 1: Evolution of SNAP Policy: 2019 Regulatory Proposals vs. 2025 OBBBA Legislation**

Policy Area	Term 1 (2019) Regulatory Proposal	Legal/Policy Outcome (Term 1)	Term 2 (2025) OBBBA Statutory Provision
ABAWD Work Req. Waivers	USDA final rule <sup>16</sup> to limit state waivers to areas with	Rule Vacated by Court. U.S. District Court for D.C.	Policy Enacted into Law. Sec. 10102 amends the

	\$>10\%\$ unemployment and restrict the "lack of sufficient jobs" (LSSJ) criterion. <sup>1</sup>	vacated the rule in Oct. 2020 as "arbitrary and capricious". <sup>1</sup>	Food and Nutrition Act to <i>remove</i> the LSSJ criterion and statutorily limit waivers <i>only</i> to areas with unemployment \$>10\%\$. <sup>5</sup>
<b>Broad-Based Categorical Eligibility (BBCE)</b>	USDA proposed rule <sup>18</sup> to redefine "benefits" for eligibility as "ongoing and substantial," (e.g., \$> \text{\\$50}\text{\text{month}}\$ ) <sup>17</sup> , ending use of nominal benefits (e.g., brochures). <sup>21</sup>	<b>Rule Withdrawn.</b> The proposal faced massive opposition and was formally withdrawn by the subsequent administration in June 2021. <sup>21</sup>	<b>Policy Enacted (in part).</b> While not a full BBCE ban, OBBBA's Sec. 10108 achieved a similar goal of restricting eligibility for specific, non-work-related populations (lawfully present immigrants). <sup>41</sup>
<b>Standard Utility Allowances (SUA)</b>	USDA proposed rule <sup>22</sup> to "standardize the methodology" for calculating SUAs, a move critics argued would cut benefits. <sup>23</sup>	<b>Proposal Stalled.</b> The 2019 proposal was not finalized. FNS later issued a final rule in Nov. 2024 that <i>added</i> internet costs. <sup>6</sup>	<b>Policy Enacted into Law.</b> Sec. 10104 <i>reverses</i> the 2024 rule, <i>prohibiting</i> states from treating internet costs as an allowable shelter expense for the excess shelter deduction. <sup>6</sup>

## Analysis of Key SNAP Provisions (Title X, Subtitle A)

The OBBBA is a complex, multi-faceted law. Its key SNAP provisions (codified in Title X) are analyzed below.

Sec. 10102: The Expansion and Redefinition of ABAWD Work Requirements



This section is the core of the administration's "work and responsibility" agenda.

- **Age Limit:** The law increases the age of adults subject to the 3-month ABAWD time limit from the 18-54 cohort to 18-64.<sup>4</sup> Individuals aged 60-64 are now in the paradoxical position of being exempt from SNAP's *general* work requirements but *subject* to the far more punitive ABAWD 3-month time limit.<sup>42</sup>
- **Elimination of Exemptions:** Most significantly, Sec. 10102 *removes* long-standing exemptions for populations with widely recognized barriers to employment: **veterans, individuals experiencing homelessness, and youth (up to age 24) aging out of foster care.**<sup>3</sup>
- **Caregiver Exemption:** The exemption for adults caring for a child is narrowed from a child under 18 to a child under 14.<sup>3</sup>
- **New Exemptions:** In a notable political move, the same section that removes exemptions for veterans and the homeless *creates* new, specific exemptions for "an Indian," "Urban Indian," and "California Indian" as defined in the Indian Health Care Improvement Act.<sup>3</sup> This selective redrawing of "deserving" populations reveals a nuanced political calculus, not a simple, universal work mandate.

#### Sec. 10102 (cont.): The Statutory Elimination of State Waivers

This provision codifies the failed 2019 rule, permanently and severely restricting state flexibility. It amends the Food and Nutrition Act to remove the "lack of sufficient jobs" criterion for states seeking ABAWD waivers.<sup>5</sup> Waivers are now permitted only for areas with a verified unemployment rate of over 10 percent.<sup>5</sup> As noted by analysts, this is a level of unemployment well above that experienced in many parts of the country even during deep recessions.<sup>14</sup> All existing state waivers were statutorily terminated as of November 2, 2025.<sup>14</sup>

#### Sec. 10105 & 10106: The Structural Shift in Funding (Cost-Shifting)

These two sections represent the most profound, long-term structural change to SNAP since its inception, moving it away from a 100% federally-funded entitlement and toward a block-grant-style model.

- **Sec. 10106 (Administrative Costs):** This section *ends* the 50/50 federal-state split for SNAP administrative costs. Effective in FY2027, the federal government will only reimburse states for **25%** of their costs for eligibility determination, staff training, and IT systems.<sup>9</sup>
- **Sec. 10105 (Benefit Costs):** In a radical departure, this provision *requires states to pay a share of the actual food benefit costs* for the first time.<sup>34</sup> Beginning in FY2028, states will be required to pay a state match, ranging from \$0%\$ to \$15%\$, based on their Quality Control (QC) payment error rate.<sup>3</sup>

#### Sec. 10108: Alien Eligibility and the "Lawfully Present" Distinction

While the administration promoted this provision as "remov[ing] illegal aliens" from welfare,<sup>39</sup> this was a misrepresentation. Undocumented individuals were already ineligible for federal SNAP benefits.<sup>45</sup>

This provision's actual target was *lawfully present immigrants*. Sec. 10108 amends Section 6(f)



of the Food and Nutrition Act to restrict non-citizen eligibility *only* to U.S. nationals, Lawful Permanent Residents (LPRs, who are subject to a 5-year waiting period), Cuban and Haitian entrants, and Compact of Free Association (COFA) citizens.<sup>41</sup>

The impact of this change is the *removal* of SNAP eligibility for previously eligible humanitarian groups, including **refugees, asylees, victims of human trafficking, and survivors of domestic violence (VAWA self-petitioners)**.<sup>7</sup> This provision was effective *immediately* on July 4, 2025, for all new applicants and was to be applied to existing households at their next recertification.<sup>41</sup>

#### Other Key Provisions:

- **Sec. 10101 (Thrifty Food Plan):** As noted, this provision freezes the purchasing power of SNAP by amending the Act to limit future TFP re-evaluations from *increasing* the cost of the plan.<sup>3</sup>
- **Sec. 10104 (Standard Utility Allowance):** This provision prohibits states from treating *internet costs* as an allowable shelter expense for the excess shelter deduction <sup>6</sup>, directly reversing a Nov. 2024 FNS rule and codifying the administration's 2019 policy goal.
- **Sec. 10107 (SNAP-Ed):** This section ends mandatory federal funding for the SNAP Nutrition Education and Obesity Prevention Grant Program (SNAP-Ed), effective October 1, 2025.<sup>3</sup>

#### Implementation and Compliance

The USDA and FNS, under Acting Associate Administrator Ronald Ward, issued initial implementation guidance memos to state agencies in September and October 2025.<sup>3</sup> The USDA granted states a 120-day "hold harmless" period for Quality Control (QC) errors to give them time to update IT systems and train staff.<sup>3</sup> However, states were required to be in full compliance with the new ABAWD rules by November 1, 2025.<sup>4</sup> This compliance deadline, set by the new law, collided directly with the federal government shutdown, setting the stage for the crisis that followed.

**Table 2: Analysis of Key SNAP Provisions in the "One Big Beautiful Bill Act" (OBBBA) of 2025**

Section #	Policy Provision	Administration Justification (Claim)	Implementation / Effective Date
<b>Sec. 10101</b>	Re-Evaluation of Thrifty Food Plan (TFP)	(Fiscal savings)	Effective Oct. 1, 2025. Next re-evaluation (no earlier than 2027) is

			prohibited from increasing cost. <sup>3</sup>
<b>Sec. 10102</b>	ABAWD Work Req. (Age 18-64)	"Restores the dignity of work... for able-bodied Americans."	Effective July 4, 2025. Full state implementation required by Nov. 1, 2025. <sup>4</sup>
<b>Sec. 10102</b>	ABAWD Work Req. (Eliminates Vet/Homeless/Foster Exemptions)	"Commonsense... work, volunteer, education, or training requirements."	Effective July 4, 2025. Full state implementation required by Nov. 1, 2025. <sup>4</sup>
<b>Sec. 10102</b>	ABAWD State Waivers (10% Unemployment Floor)	(Program integrity / promoting work)	Effective July 4, 2025. Removes "lack of sufficient jobs" criterion. <sup>5</sup>
<b>Sec. 10104</b>	Standard Utility Allowance (SUA)	(Program integrity / cost savings)	Effective July 4, 2025. Prohibits inclusion of internet costs in shelter deduction. <sup>6</sup>
<b>Sec. 10105</b>	Benefit Cost-Sharing (New State Match)	(Fiscal savings / state "skin in the game")	Effective Fiscal Year 2028. States pay 0-15% of benefit costs based on QC error rates. <sup>3</sup>
<b>Sec. 10106</b>	Administrative Cost-Sharing	(Fiscal savings)	Effective Fiscal Year 2027. Reduces federal reimbursement for state admin costs from 50% to 25%. <sup>9</sup>
<b>Sec. 10107</b>	SNAP-Ed	(Fiscal savings)	Effective Oct. 1, 2025. Ends mandatory federal

			funding for nutrition education. <sup>3</sup>
<b>Sec. 10108</b>	Alien Eligibility	"Removes illegal aliens" from welfare.	Effective July 4, 2025. Applied immediately to new applicants; at recertification for existing households. <sup>41</sup>

## V. Projected and Real-World Impacts of the OBBBA

The OBBBA's sweeping changes were projected by government and independent analysts to have severe, immediate impacts on program participation, state budgets, and the U.S. economy.

### CBO and Think Tank Projections: Quantifying the Impact

The CBO and other policy institutes quickly analyzed the law's expected consequences, painting a stark picture of the trade-offs between federal savings and recipient hardship.

- **Budgetary Impact:** The CBO estimated that the OBBBA's SNAP provisions (Title X, Subtitle A) would reduce federal spending by **\$279 billion** over the 2025-2034 period.<sup>15</sup>
- **Participation Impact (Work Requirements):** The CBO estimated that **2.4 million people** would lose SNAP benefits in an average month due to the new work-requirement provisions in Sec. 10102.<sup>14</sup> The CBO provided a detailed breakdown of this 2.4 million:
  - Approximately 800,000 able-bodied adults through age 64 without dependent children.
  - Approximately 300,000 able-bodied adults (18-64) who live with children aged 14 or older.
  - Approximately 1 million other adults (18-54) who do not live with dependents but would lose benefits due to the elimination of state waivers.<sup>52</sup>
- **Participation Impact (Young Adults):** The Urban Institute provided a more granular analysis, estimating that nearly **700,000 young adults (ages 18-24)** alone would lose

some or all of their benefits.<sup>37</sup> This disproportionate impact is attributed to their unstable work hours and the OBBBA's *specific elimination* of the exemptions for former foster youth and individuals experiencing homelessness, two groups to which young adults are uniquely exposed.<sup>37</sup>

- **Participation Impact (Alien Eligibility):** The CBO separately estimated that **90,000 people** per month, on average, would become ineligible for benefits due to the new non-citizen restrictions in Sec. 10108.<sup>52</sup> These are not undocumented individuals, but rather the lawfully present refugees, asylees, and trafficking victims <sup>7</sup> who were stripped of eligibility.

**Table 3: Projected SNAP Participation and Budgetary Impacts of OBBBA (2026-2035)**

OBBBA Provision (Section #)	Data Source	10-Year Budgetary Impact (Federal Savings)	10-Year Participation Impact (Avg. Monthly Persons Losing Benefits)
All SNAP Provisions (Title X, Subtitle A)	CBO	\$279 Billion	Not specified (total)
	15		
Work Requirements (Sec. 10102)	CBO	Not specified (partial)	2,400,000
	14		
Work Requirements (Sec. 10102) - <i>Young Adults (18-24) only</i>	Urban Institute	Not specified	700,000
	37		

<b>Alien Eligibility (Sec. 10108)</b>	CBO	\$1.9 Billion	90,000
	49		

## State-Level Analysis: The New Unfunded Mandate

The OBBBA's cost-shifting provisions (Sec. 10105 & 10106) created a massive new financial burden for states, effectively turning the program into a new unfunded or under-funded mandate.<sup>34</sup>

- Maryland Example:** The state of Maryland estimated that the new law would place 80,000 additional Marylanders at risk of losing benefits due to the new work rules. Simultaneously, the state projected the combined cost-shifts for administration and benefits would cost Maryland taxpayers an *additional \$300 million*.<sup>54</sup>
- Massachusetts Example:** The Massachusetts Department of Transitional Assistance (DTA) estimated that 99,000 *more* people in the state would become subject to the complex new work rules.<sup>55</sup> The agency warned that due to the "confusing and administratively burdensome" nature of these rules<sup>55</sup>, many eligible individuals would likely lose benefits simply due to paperwork challenges—a finding supported by Urban Institute research showing that administrative burdens are a primary driver of benefit loss.<sup>56</sup>

## Rebuttals and Analysis: The "Automatic Stabilizer" Debate

Policy analysts at institutions like the Brookings Institution and the Food Research & Action Center (FRAC) argued that the OBBBA's most damaging, long-term impact was the *structural dismantling* of SNAP's role as a national *automatic stabilizer*.<sup>14</sup>

Historically, SNAP has been a key automatic stabilizer because its enrollment *automatically* expands during an economic downturn, injecting federal dollars into local economies (every \$1 of SNAP spending generates ~\$1.50 in economic activity<sup>57</sup>) and providing food assistance to those who lose jobs, with no new legislative action required.<sup>14</sup>

The OBBBA's structural changes *reverse* this function:

1. **Contracting During a Downturn:** The new law *contracts* SNAP in a downturn. By eliminating state waivers for unemployment rates *below* 10 percent <sup>5</sup>, the OBBBA will now cut off ABAWDs from food assistance precisely when a recession begins and unemployment rises to 7, 8, or 9 percent—a level that previously would have triggered a waiver.<sup>14</sup>
2. **Imposing Pro-Cyclical Costs on States:** The new state cost-sharing for benefits and administration <sup>3</sup> is pro-cyclical. In a recession, state tax revenues plummet *at the same time* that SNAP enrollment (and thus state liability) would rise. This creates an "impossible trade-off" <sup>34</sup> for states, forcing them to either raise taxes in a recession, cut other public services, or implement new administrative barriers to suppress SNAP enrollment and control their new, direct financial liability.<sup>44</sup>

The Commonwealth Fund projected that the OBBBA's SNAP and Medicaid cuts would lead to **1.22 million lost jobs** nationwide by 2029. This analysis also suggested the policy was economically counter-productive, with the federal "savings" of \$131 billion being *less* than the \$154 billion in economic damage (lost GDP) inflicted on state economies.<sup>58</sup>

## VI. Crisis Point: The October–November 2025 Government Shutdown

The OBBBA's implementation deadline for new ABAWD rules—November 1, 2025 <sup>4</sup>—collided directly with a 43-day federal government shutdown, which began on October 1, 2025.<sup>59</sup> This convergence created a crisis that tested the administration's new policies and its relationship with the states, culminating in a legal and administrative battle over the distribution of November benefits.

### The 43-Day Shutdown and the Funding Standoff (Oct 1 - Nov 12)

The shutdown began after Congress failed to pass appropriations for the new fiscal year.<sup>59</sup> Because SNAP benefits are funded by federal appropriation, their issuance was immediately threatened.

- **The USDA Warning:** In late October, the USDA formally notified states that federal funding for SNAP would be suspended on November 1.<sup>60</sup> On October 24, the USDA told states it would *not* fund November SNAP benefits.<sup>10</sup>

- **The State/Recipient Impact:** This announcement created immediate panic for 42 million recipients.<sup>4</sup> States like Oklahoma and South Carolina warned residents that benefits would be suspended.<sup>60</sup> Washington state began transferring \$2.2 million in *state* funds to local food banks to prepare for the crisis.<sup>63</sup>
- **The Administration's Posture:** The administration's public position was that it lacked the money.<sup>64</sup> President Trump explicitly linked the benefits to the shutdown negotiations, posting on social media that benefits "will be given only when the Radical Left Democrats open up the government... and not before!".<sup>38</sup>

## The Legal Battle for November Benefits

A coalition of states—including Massachusetts, New York, New Jersey, and California—and several nonprofit organizations immediately sued the Trump administration.<sup>11</sup>

- **The States' Argument:** The lawsuits argued the administration was *illegally* withholding benefits.<sup>11</sup> They contended that the USDA was *legally required* by the Food and Nutrition Act to use a multi-billion dollar SNAP *contingency fund* specifically appropriated by Congress for such funding lapses.<sup>11</sup>
- **The District Court Orders:** On October 31, 2025, federal judges in Massachusetts<sup>66</sup> and Rhode Island<sup>69</sup> ruled in favor of the states. U.S. District Judge John J. McConnell (RI) issued an order compelling the USDA to use its contingency fund to pay *full* November benefits.<sup>69</sup>
- **The Administration's Appeal:** The administration immediately appealed, taking the case to the Supreme Court. The Justice Department, led by Solicitor General D. John Sauer, argued that the contingency fund (approx. \$4.6 billion) was insufficient to cover the full \$8 billion monthly cost<sup>4</sup> and that Judge McConnell's order was an improper intervention by "politically unaccountable federal courts" into a political branch negotiation.<sup>73</sup> The administration argued it could only pay *partial* benefits, first offering 50%<sup>75</sup> before revising its calculations to 65%.<sup>72</sup>

## Chaos and Confusion: The "Patchwork" Distribution and the "Undo" Memo

The legal and administrative chaos peaked over the weekend of November 8-9, 2025.

1. **Court Upholds Full Pay:** A panel of the 1st U.S. Circuit Court of Appeals *denied* the



administration's request for a stay, *upholding* Judge McConnell's full-payment order.<sup>29</sup>

2. **States Pay Benefits:** Acting on this *valid and active court order*, states like Massachusetts<sup>55</sup>, New York<sup>79</sup>, and Wisconsin<sup>80</sup> immediately issued *full* November benefits to their residents.
3. **SCOTUS Issues Stay:** Late on Friday night (Nov 7/8), the administration secured a temporary *administrative stay* from Justice Ketanji Brown Jackson, the justice assigned to emergency appeals from the 1st Circuit. This stay *paused* Judge McConnell's order.<sup>81</sup>
4. **The "Undo" Memo:** On Saturday, November 8, USDA Deputy Undersecretary Patrick Penn issued an explosive memo to all state SNAP directors.<sup>13</sup>
  - The memo declared that any *full* payments already issued (in compliance with the now-stayed court order) were "**unauthorized**".<sup>13</sup>
  - It commanded states: "**States must immediately undo any steps taken to issue full SNAP benefits for November 2025**".<sup>13</sup>
  - It *threatened* non-compliant states with financial penalties, including the cancellation of federal administrative funds and holding the states personally liable for the "overissuances".<sup>13</sup>

This memo, combined with "four different directives in six days"<sup>86</sup>, created a "patchwork distribution" of benefits nationwide<sup>10</sup>:

- **Defiant States (Full Pay):** Massachusetts Governor Maura Healey held a press conference telling recipients to "forget the noise" and "Go out and buy the food that you need," vowing "we will see him in court".<sup>78</sup> Wisconsin Governor Tony Evers issued a flat "No" in response to the memo.<sup>80</sup> These states filed for a new temporary restraining order to block the "claw back".<sup>78</sup>
- **Partial Pay States:** About two-thirds of states<sup>10</sup> complied with the administration's 65% directive. Missouri, Louisiana, Georgia, and Illinois all issued *partial* benefits.<sup>89</sup>
- **No Pay / Paused States:** The chaos forced some states, like Massachusetts, to halt the processing of *new* SNAP applications, leaving new applicants in limbo.<sup>4</sup> Recipients in states like Wisconsin reported receiving nothing at all for the first week of November.<sup>93</sup>

## Resolution

The crisis was resolved by Congress. On November 11, the Supreme Court extended its administrative stay until 11:59 p.m. on November 13, a move widely seen as giving the political branches time to end the shutdown.<sup>29</sup>

On November 12, 2025, Congress passed, and the President signed, a Continuing Resolution that ended the 43-day shutdown.<sup>96</sup> The bill *explicitly* provided full-year funding for the

Agriculture appropriations bill, funding SNAP through September 2026.<sup>97</sup>

On November 13, the Justice Department withdrew its Supreme Court appeal as moot.<sup>74</sup> The USDA, in a complete reversal, issued *new* guidance instructing states to "take immediate steps to ensure households receive their full November allotments promptly".<sup>26</sup> States that had issued partial benefits then scrambled to issue the remaining 35%.<sup>10</sup>

The timeline below details the rapid escalation and resolution of the crisis.

**Table 4: Timeline of the November 2025 SNAP Distribution Crisis**

Date (Oct-Nov 2025)	USDA / White House Action	Judicial Action	State / Recipient Impact
Oct. 24	USDA notifies states it will <i>not</i> fund November SNAP benefits due to shutdown. <sup>10</sup>		Panic; states (OK, WA) warn residents, prep food banks. <sup>60</sup>
Oct. 28	Administration holds firm; President links benefits to negotiations. <sup>38</sup>	States (MA, NY, CA, NJ) sue USDA to release SNAP contingency fund. <sup>11</sup>	42 million recipients left in uncertainty. <sup>4</sup>
Oct. 31		<b>District Court (Judge McConnell) orders USDA to pay <i>full</i> November benefits</b> using contingency fund. <sup>66</sup>	States prepare to issue benefits.
Nov. 4-5	USDA appeals. Revises public stance to offer <i>partial</i> 65% benefits from contingency fund. <sup>72</sup>	Administration files for an emergency stay from the 1st Circuit.	Confusion mounts. States receive partial 65% allotment tables. <sup>76</sup>

Nov. 7 (PM)		<b>1st Circuit Court of Appeals <i>denies</i> administration's stay</b> , upholding the <i>full</i> payment order. <sup>29</sup>	States (MA, NY, WI) have a valid, active court order to pay in full.
Nov. 8 (AM)			<b>MA, NY, WI comply with 1st Circuit order</b> , issue <i>full</i> November benefits. <sup>78</sup>
Nov. 8 (PM)	Administration appeals to SCOTUS.	<b>SCOTUS (Justice Jackson) issues a temporary administrative stay</b> , pausing the full-pay order. <sup>81</sup>	Legal whiplash. The 1st Circuit order is now frozen.
Nov. 8 (Night)	<b>USDA (Patrick Penn) issues "UNDO" memo.</b>		Memo declares full payments "unauthorized" <sup>81</sup> ; orders states to "immediately undo" them <sup>13</sup> ; threatens penalties. <sup>84</sup>
Nov. 9-10	Solicitor General Sauer files briefs arguing against "politically unaccountable" courts. <sup>73</sup>		<b>CHAOS.</b> States are defiant (MA, WI). <sup>78</sup> Most states issue 65% (MO, LA, GA). <sup>89</sup> New applications are paused. <sup>55</sup>
Nov. 11		SCOTUS extends its stay until 11:59 p.m., Nov. 13, signaling to Congress to act. <sup>74</sup>	"Patchwork" distribution. <sup>10</sup>

<b>Nov. 12</b>	<b>President Trump signs CR, ending the 43-day shutdown.</b> The bill fully funds SNAP. <sup>96</sup>		Shutdown ends.
<b>Nov. 13</b>	Justice Dept. withdraws its Supreme Court appeal as moot. <sup>74</sup> USDA issues new memo: "pay full benefits promptly". <sup>26</sup>		States scramble to issue the remaining 35% to partial-pay households. <sup>10</sup>

## VII. Concluding Analysis

The events of 2025, from the passage of the OBBBA in July to the shutdown crisis in November, have fundamentally restructured the Supplemental Nutrition Assistance Program. The analysis of these events reveals two profound, long-term implications for the future of American food assistance.

### The New Normal: SNAP as a Hybrid Federal-State Program

The OBBBA's cost-shifting provisions (Sec. 10105 & 10106) represent a permanent, structural change. By cutting the federal reimbursement for administrative costs from 50% to 25%<sup>9</sup> and, more critically, by requiring states to pay a 0-15% match on *benefit* costs for the first time<sup>3</sup>, the law ends SNAP's 60-year history as a 100% federally-funded entitlement.

States are no longer just *administrators* of a federal program; they are now *financial stakeholders* with "skin in the game".<sup>34</sup> This change creates a powerful and perverse new incentive structure. States will be financially motivated to invest in *gatekeeping* and *disenrollment*—such as increased paperwork demands<sup>56</sup> or verification hurdles—to suppress participation. This is the only way for them to control their new, direct financial liability for benefit costs and to avoid the fiscal penalties associated with higher Quality Control (QC)

error rates.<sup>3</sup>

## The Precedent of the 2025 Shutdown

The October–November shutdown was not merely a passive side-effect of a funding dispute; it was an active demonstration of the administration's willingness to use SNAP as political leverage. The President's explicit statements linking benefits to negotiations<sup>38</sup>, the Justice Department's legal arguments against "politically unaccountable" courts<sup>73</sup>, and the USDA's "undo" memo<sup>13</sup> reveal a coordinated, multi-branch strategy to weaponize administrative ambiguity.

The "undo" memo<sup>13</sup> set a dangerous new precedent. By retroactively declaring state actions "unauthorized" *after* those states had complied with a valid federal court order, the administration signaled its willingness to enforce executive policy preferences through administrative threats, catching states<sup>55</sup> and recipients<sup>93</sup> in a chaotic legal and political crossfire.

## Forward-Looking Analysis

The combined impact of the OBBBA and the shutdown crisis leaves states in a structurally contradictory and untenable position.

1. States are now legally *mandated* by the OBBBA to implement a complex, confusing, and administratively burdensome new set of work rules and eligibility restrictions.<sup>4</sup>
2. Simultaneously, the federal reimbursement for *doing* this new administrative work is being *cut in half*.<sup>9</sup>
3. Finally, states now face a *new* financial liability for the benefit costs themselves, directly incentivizing them to *reduce* participation.<sup>3</sup>

This structural contradiction—mandating more work for less money, while adding new financial penalties—will almost certainly lead to a new wave of state-level litigation. It will also accelerate a divergence in program access between states, depending on their political will or financial capacity to absorb these new costs. Ultimately, the OBBBA has succeeded in transforming SNAP from a uniform, rights-based national safety net into a fragmented, state-variable program with a permanently diminished capacity to respond to economic shocks.

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