



Comparison of SNAP Proposals for Reconciliation

Policy Area	Current Law	House Proposal (Passed 5/22/25)		Initial Senate Agriculture Proposal (Released 6/11/25)		Revised Senate Agriculture Proposal (Released 6/25/25) Plus Full Bill Text (Released 6/28/25)		Senate Proposal (Passed 7/1/25)		Notes
		Proposed Provision	Effective Date	Proposed Provision	Effective Date	Proposed Provision	Effective Date	Proposed Provision	Effective Date	
Total SNAP Cuts	\$112 billion total FY23 federal SNAP spending	Roughly \$300 billion in estimated total cuts	FY25-FY34	A little over \$200 billion in estimated total cuts	FY25-FY34	\$186 billion in estimated total cuts	FY25-FY34	Not yet scored; likely less than revised Senate proposal		Passage would result in 20-30% cut in annual SNAP spending
Thrifty Food Plan (TFP)	<ul style="list-style-type: none">• Basis for calculating SNAP benefits• 2018 Farm Bill called for revision every 5 years and removed cost neutrality requirement• Last updated in 2021	<ul style="list-style-type: none">• Limits future updates to inflation alone• Requires use of the formal rulemaking process <i>CBO Score: \$37 billion</i>	Upon passage	Limits future updates to inflation alone	Upon passage	<i>Same as initial Senate Agriculture Committee proposal</i> <i>CBO Score: \$37 billion</i>	<i>Upon passage</i>	<i>Same as initial Senate Agriculture Committee proposal</i>	<i>Upon passage</i>	Benefits may not keep up with the true cost of a nutritious diet considering food availability, nutrition guidance, shopping and cooking behaviors, etc.
Benefit Calculations	USDA has discretion to adjust benefits based on household size	Limits USDA discretion on adjustments for household size and specifies the exact percentage of the TFP based on household size <i>CBO score included in TFP provision</i>	Upon passage	Similar to House bill	Upon passage	<i>Same as initial Senate Agriculture Committee proposal</i> <i>CBO score included in TFP provision</i>	<i>Upon passage</i>	<i>Same as initial Senate Agriculture Committee proposal</i>	<i>Upon passage</i>	The House and Senate versions have slightly different specifications but roughly approximate the current household size adjustments.
State Admin Match	States pay 50% of administrative costs	States would pay 75% of administrative costs <i>CBO Score: \$27 billion</i>	FY 26 (Oct. 1, 2025)	Same text as House bill with different effective date	FY 27 (Oct. 1, 2026)	6/28 full text update: Removes language limiting USDA's ability to waive the state administrative cost share <i>CBO Score: \$25 billion</i>	FY 27 (Oct. 1, 2026)	<i>Same as 6/28 full text</i>	FY 27 (Oct. 1, 2026)	Increasing states' administrative cost responsibility will make it more difficult for them to invest in improving program efficiency and integrity and reducing error rates.

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Benefit Cost Shift	Fully federally funded for all eligible participants	States would be required to pay 5-25% of SNAP benefits, depending on the state's most recent complete year of payment error rate data <i>CBO Score: \$128 billion</i>	FY 28 (Oct. 1, 2027)	States would be required to pay 0-15% of SNAP benefits, depending on the state's most recent complete year of payment error rate data: <ul style="list-style-type: none">• <6%: 0% of benefit costs• 6-8%: 5% of benefits• 8-10%: 10% of benefits• >10%: 15% of benefits	FY 28 (Oct. 1, 2027)	In response to Senate Parliamentarian concern, states would be required to pay 0-15% of SNAP benefits, depending on the state's payment error rate data from three fiscal years prior (except for FY 28 when states could choose their FY 25 or FY 26 error rate); otherwise, the overall structure of the benefit cost shift is the same as the initial Senate proposal 6/28 full text update: Adds option to waive the benefit cost match for up to two years in noncontiguous states (i.e. Alaska and Hawaii) that are actively implementing plans to reduce their payment error rate <i>CBO Score: \$40 billion</i>	FY 28 (Oct. 1, 2027)	States would be required to pay 0-15% of SNAP benefits, depending on the state's payment error rate data from three fiscal years prior (except for FY 28 when states could choose their FY 25 or FY 26 error rate) with the same structure as the initial Senate proposal except that any state with a high error rate (>13.34%): <ul style="list-style-type: none">• In FY 25 may delay benefit cost matching until FY 29, and• In FY 26 may delay until FY 30.	FY 28 (Oct. 1, 2027) but possible delay for some states for up to two years	Requiring states to pay a portion of benefits is unprecedented, undercuts long-term program stability, and creates the risk of states dropping out of SNAP entirely. The Senate's revision helps states with planning for their benefit share but still presents an immense financial burden, year-to-year volatility, and uncertainty due to case load changes. States will especially struggle during recessions when they have less tax revenue but must still balance their budgets.
Payment Error Tolerance Level	Payment errors <\$56 do not need to be recovered and do not count towards the payment error rate	Reduces the tolerance level to \$0 <i>CBO Score: \$80 million</i>	Upon passage	<i>N/A (keeps current law)</i>	<i>N/A</i>	<i>N/A (keeps current law)</i>	<i>N/A</i>	<i>N/A (keeps current law)</i>	<i>N/A</i>	Reducing the payment error tolerance level would increase error rates and cause higher benefit shifts to states.
Able-Bodied Adults Without Dependents (ABAWDs)	See below for specific requirements and proposals related to ABAWDs	<i>CBO Score for all ABAWD provisions: \$92.5 billion</i>				<i>CBO Score for all ABAWD provisions: \$69 billion</i>				
ABAWD Work Requirements & Time Limits	Adults ages 18-54 are limited to receiving SNAP for no more than 3 months in 3 years unless they work ≥80 hours /month	Raises age to 64	Upon passage	<i>Same as House bill</i>	<i>Upon passage</i>	<i>Same as House bill</i>	<i>Upon passage</i>	<i>Same as House bill</i>	<i>Upon passage</i>	See here for more on general work requirements for all adults and the ABAWD time limits.

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ABAWD Work Requirement Exceptions	<ul style="list-style-type: none">Adults with dependent children <18 yearsVeterans, homeless adults, and young adults up to age 24 who aged out of foster care (through FY 30)Pregnant womenMedically certified as physically or mentally unfit for employmentCaretakers for others medically certified as disabledExempt from general work requirements	<ul style="list-style-type: none">Changes exception to adults with dependent children <7 years<ul style="list-style-type: none">Exception for adults married to an adult complying with ABAWD work requirements	Upon passage	<ul style="list-style-type: none">Changes exception to adults with dependent children <10 years<ul style="list-style-type: none">No marriage exceptionEliminates Fiscal Responsibility Act exceptions for veterans, homeless adults, and young adults up to age 24 who aged out of foster care	Upon passage	<ul style="list-style-type: none">Changes exception to adults with dependent children <14 yearsAdds exception for “Indians, Urban Indians, California Indians, and other Indians who are eligible for the Indian Health Services”<i>Other provisions same as initial Senate proposal</i>	Upon passage	<i>Same as revised Senate Agriculture Committee</i>	<i>Upon passage</i>	<ul style="list-style-type: none">Children would continue to be eligible even if their caregiver is time limited out, but the household benefit would be reducedWork requirements and time limits are time-consuming and expensive for states to administerReporting work activities is confusing and burdensome for participants
ABAWD Work Requirement Waivers	At a state’s request, USDA may waive the ABAWD work requirements in areas: <ul style="list-style-type: none">With an unemployment rate ≥10%With an insufficient number of jobs	Eliminates the option to waive the requirements in areas with an insufficient number of jobs	Upon passage	<i>Same as House bill</i>	<i>Upon passage</i>	<i>Same as House bill</i> 6/28 full text update: <ul style="list-style-type: none">Adds option to waive ABAWD work requirements in noncontiguous states (i.e. Alaska and Hawaii) that have an unemployment rate ≥1.5 times the national averageAdds option, up to December 31, 2028, to waive the ABAWD time limit in noncontiguous states (i.e. Alaska and Hawaii) if the state is making a good faith effort to comply	<i>Upon passage</i>	<i>Same as 6/28 full text</i>	<i>Upon passage</i>	Currently USDA has codified that waiver requests are “readily approvable” for areas that meet Department of Labor standards as a “labor surplus area”
ABAWD Work Requirement Discretionary Exemptions	States may exempt individual participants from the ABAWD work requirements on a case-by-case basis for up to 8 percent of the state’s caseload	Decreases the average monthly number of discretionary exemptions to 1 percent of the state’s caseload	Upon passage	<i>N/A (keeps current law)</i>	<i>N/A</i>	<i>N/A (keeps current law)</i>	<i>N/A</i>	<i>N/A (keeps current law)</i>	<i>N/A</i>	<ul style="list-style-type: none">This limits SNAP case workers’ ability to respond to individual circumstances, such as health issues or family emergencies.The Fiscal Responsibility Act already reduced the number of exemptions and states’ ability to carry over exemptions from year to year.

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Eligibility for Non-Citizens	<ul style="list-style-type: none">Limited but with several exceptionsImmigrants must have legal status	<ul style="list-style-type: none">Limits eligibility to<ul style="list-style-type: none">CitizensLegal permanent residents (green card holders),Certain lawfully present Cuban nationals, andLawfully residing Compacts of Free Association (COFA) citizens.Eliminates eligibility for refugees, asylees, and others <i>CBO Score: \$4 billion</i>	Upon passage	<i>Same as House bill</i>	<i>Upon passage</i>	<ul style="list-style-type: none">In response to Senate Parliamentary concern, changes language for Cuban nationals and retains eligibility for those granted status as both Cuban and Haitian entrants<i>Other provisions same as House bill</i> <i>CBO Score: \$2 billion</i>	Upon passage	<i>Same as revised Senate Agriculture Committee proposal</i>	<i>Upon passage</i>	<ul style="list-style-type: none">See here for more on the current eligibility for non-citizens including waiting periodsCOFA citizens are those from the Federated States of Micronesia, the Republic of the Marshall Islands, and the Republic of Palau.
“Heat and Eat” SNAP/LIHEAP Link	<ul style="list-style-type: none">States may allow households receiving at least \$20 annually in LIHEAP benefits to get the standard utility allowance deductionStates may allow LIHEAP participation to confer categorical eligibility for SNAP	Limits use of the standard utility allowance for LIHEAP and state energy assistance program participants to households with elderly or disabled members only <i>CBO Score: \$6 billion</i>	Upon passage	<i>Same as House bill</i>	<i>Upon passage</i>	<i>Same as House bill</i> <i>CBO Score: \$6 billion</i>	<i>Upon passage</i>	<i>Same as House bill</i>	<i>Upon passage</i>	Participating in LIHEAP can streamline the application process for SNAP by standardizing how utility costs are treated in the net income calculation for determining eligibility and benefit level.
Inclusion of Internet Costs in Shelter Costs	Internet costs are currently an allowable cost when computing the excess shelter expense deduction for the purposes of calculating benefit amount	Restricts inclusion of internet costs in computing the excess shelter expense deduction <i>CBO Score: \$11 billion</i>	Upon passage	<i>Same as House bill</i>	<i>Upon Passage</i>	<i>Same as House bill</i> 6/28 full text update: Simplifies the language by removing examples of internet service fees <i>CBO Score: \$11 billion</i>	<i>Upon passage</i>	<i>Same as 6/28 full text (and substantively same as House bill)</i>	<i>Upon passage</i>	
National Education and Obesity Prevention Program	This program funds SNAP Education (SNAP-Ed)	Deletes the section of the law authorizing SNAP-Ed, eliminating its funding <i>CBO Score: \$5.5 billion</i>	Upon passage	Preserves text of the law dedicated to SNAP-Ed but ends funding after FY2025	FY 26 (Oct. 1, 2025)	<i>Same as initial Senate Agriculture Committee proposal</i> <i>CBO Score: \$5.5 billion</i>	FY 26 (Oct. 1, 2025)	<i>Same as initial Senate Agriculture Committee proposal</i>	FY 26 (Oct. 1, 2025)	
National Accuracy Clearinghouse (NAC)	The NAC is currently voluntary and in use by 9 states but under current regulation all must adopt its use by October 2027	Requires all states to use the NAC to prevent multiple SNAP issuances across states <i>CBO Score: \$7 billion</i>	Upon passage	<i>N/A (keeps current law)</i>	<i>N/A</i>	<i>N/A (keeps current law)</i>	<i>N/A</i>	<i>N/A (keeps current law)</i>	<i>N/A</i>	The NAC is a technology solution designed to prevent the receipt of SNAP in multiple states at the same time.

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