

Montana Food Bank Network: SNAP Changes in HR 1



Presented by: Kiera Condon, Advocacy Specialist

Our Work



As Montana's statewide food bank, we take a multi-pronged approach to ending hunger in MT - food acquisition and distribution, education, and advocacy.

MFBN supplies, supports, and collaborates with a network of more than 330 partners ranging from full-service independent pantries to schools, senior centers, shelters, and other community sites. Our network reaches large urban areas as well as small towns, rural areas, and tribal nations.

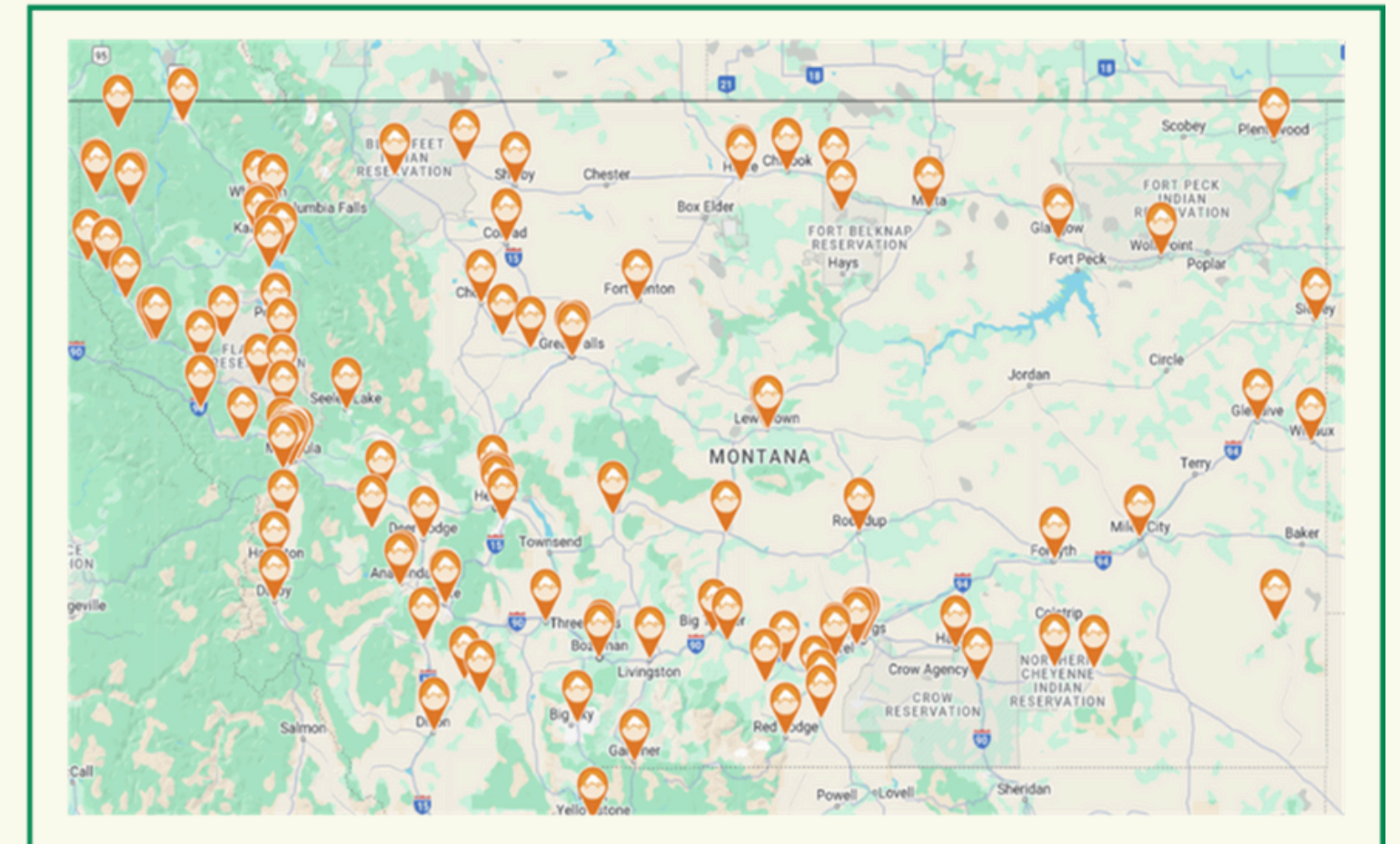
MFBN also works to end hunger through advocacy and long-term policy solutions.

1 in 9 Montanans, including 1 in 6 children experience food insecurity.

56 counties.

We reach communities in every county of Montana.

We work on all 7 Reservations in Montana.



32 partners, SNAP outreach and application assistors.
Roughly 75% SNAP application assistors also do Medicaid application assistance.

Federal Costs Onto States

Increased Administrative Costs

- Starting Federal Fiscal Year (FFY) 2027 (Oct. 1, 2026), MT will be responsible for 75% of SNAP administrative costs.
- Historically, states have paid roughly 50% of SNAP admin costs. In 2023, MT paid 50% of SNAP admin. costs—approximately \$13.9 million. Increasing the state's share to 75% would add roughly \$8.1 million in additional costs.
- Assuming a 75% state responsibility, MT will face roughly \$22 million in annual SNAP admin. costs.

Federal Costs Onto States

State SNAP Benefit Cost-Share

- Starting FY2028 (Oct. 1, 2027), MT will be required to pay a share of SNAP benefits if the state's payment error rate (PER) is 6% or higher.
- If a state has a PER 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 share is 15%.
- For FFY2028, states will choose if they use their FFY2025 or FFY2026 PER. For FFY2029 and after, the state's cost requirement will be based on the PER for the fiscal year 3 years prior.
- In FFY24 MT had an error rate of 8.89%. Based on the current SNAP funds issued to MT families annually, if MT needed to provide 10% of SNAP benefits, it would cost the state roughly \$16.7 million/year. If MTs error rate were to rise to 10%, it would cost roughly \$25.1 million/year.
- 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.

Prevents Future Updates to the Thrifty Food Plan

- SNAP benefits are based on scientific nutrition standards, modern food preparation, and food costs.
- Effective, Oct. 1, 2025 - prohibits USDA from making future increases to the cost of the Thrifty Food Plan - essentially freezing SNAP benefit amounts.
- Across MT, on average the cost of a meal is 24% higher than the SNAP benefit.
- Over time, SNAP benefits will become more and more inadequate and out of step with modern life for low-income MT families.
- The amount of the cut will grow over time - cutting SNAP for every MT SNAP household in the future.

Eliminates SNAP Nutrition Education

- SNAP-Ed connects SNAP families to nutrition resources and services.
- SNAP-Ed supports low-income Montanans in making the healthy choice the easy choice through a dual focus on nutrition and physical activity education and partnering with local and statewide organizations to improve policies, systems, and environments that support healthy behaviors.
- In FFY2025 DPHHS received \$1 million in federal dollars for the SNAP-Ed program.
- Ends required funding of SNAP-ED with the fiscal year 2025 grant allocation.
- MSU-Extension's grant allocation will end Feb. 2026.
- MSU-Extension has applied for funds through the Rural Health Transformation Program.

Bars Thousands of Immigrants with Official Humanitarian Protections From SNAP

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.

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

This change is a stark departure from America’s long standing, bi-partisan commitment to people fleeing violence and persecution.

- 5-year bar does not apply to individuals who entered as an asylee, refugee, or with another humanitarian protection and then become LPRs.
- If clients are being subject to the 5-year bar and have LPR status, let us know we are working with DPHHS and national/state immigration groups to advocate for these folks.

Expands 3-month Time Limit

October 3rd USDA Guidance:

Implementation

Effective upon enactment (July 4th, 2025).

120-day variance exclusion

Starting November 1st 2025, state agencies must immediately screen for and apply the modified exception criteria to all initial applications and recertification applications.

Increase the Upper Age Limit

- The ABAWD time limit now applies to adults ages 18–64 (previously 18–54), unless they qualify for an exemption.
- People age 60 or older are still considered “elderly” and remain exempt from general work requirements and eligible for elderly-specific SNAP policies (like medical and shelter deductions).

Changes to the Exception for Children in the Household

- Adults in a SNAP household with children between ages 14 and 17 are now subject to the time limit, unless they meet another exception, including caring for a child in the household under age 14.

End of Exceptions Implemented by the FRA of 2023

- Individuals once again subject to the time limit:
 - Individuals experiencing homelessness
 - Veterans
 - Former foster youth aged 24 or younger

Expands 3-Month Time Limit

Restricts State Option to Waive Time-Limits

- States can request permission from USDA to waive the time limit for adults who live in areas with elevated rates of unemployment based on certain unemployment data standards or other factors that would present significant challenges to meeting work requirements.
- MT has qualified for these waivers in the past and had a geographic waiver that applied to all reservations except the Flathead.
- Oct. 3, FNS stated that they “strongly encourages State agencies to terminate active ABAWD waivers approved under the outdated “lack of sufficient jobs” criteria as soon as possible”. In the same memorandum USDA announced that they would be terminating any ABAWD waivers previously approved under the lack of sufficient jobs criteria on November 2, 2025.
- MT complied and our waiver was terminated Nov. 2 - 7 months before the waiver was set to expire.

Expands 3-month Time Limit

October 3rd USDA Guidance:

New Exceptions

- **“An Indian”**
 - Are a member of an Indian tribe - “any Indian tribe, band, nation, or other organized group or community, including any Alaska Native village or group or regional or village corporation as defined in or established pursuant to the Alaska Native Claims Settlement Act, which is recognized as eligible for the special programs and services provided by the United States to Indians because of their status as Indians.”
- **“An Urban Indian”**
 - Reside in an urban area and meet one of the following: a member of a tribe, band, or other organized group of Indians, including those tribes, bands, or groups terminated since 1940 and those recognized now or in the future by the State in which they reside, or who is a descendant, in the first or second degree of any such member. Is an Eskimo or Aleut or other Alaska Native. Is determined to be an Indian for any purpose under regulations promulgated by the Secretary of Interior; or is determined to be an Indian under regulations promulgated by the Secretary of Health and Human Services.
- **“A California Indian”**

***Particularly impactful for Tribal members living in urban areas and the Flathead**

***Those living on a Reservation, unless deemed “questionable” DPHHS will assume that they meet the “Indian” exception**

Standard Utility Allotments

Implementation:

Effective upon enactment (July 4th, 2025)

State agencies must apply this policy:

- At initial certification for new applicants.
- At recertification for ongoing households.

Automatic Eligibility

- Only households with an elderly or disabled member are automatically eligible for the Heating and Cooling Standard Utility Allowance (HCSUA).
- To qualify automatically, they must receive more than \$20 annually in energy assistance (LIHEAP or similar) in the month of application or the previous 12 months.

Households Without Elderly or Disabled Members

- No longer automatically eligible for HCSUA based on any amount of energy assistance.
- Must instead show they incur heating or cooling costs to qualify for HCSUA.

Treatment of Third-Party Energy Assistance Payments

With elderly/disabled member:

- Assistance does NOT count as income.
- Household may still count related energy expenses toward the excess shelter deduction.

Without elderly/disabled member:

- Assistance continues to count as income.
- Cannot count the covered expenses toward the excess shelter deduction.

Join MFBN as a SNAP Outreach Partner/Application Assistor



As a Partner:

- Receive quarterly SNAP newsletter and regular updates on SNAP
- Be eligible for a SNAP mini-grant from MFBN
- Provide information/resources to clients interested in applying for SNAP
- Assist clients with completing the SNAP application
- Ensure current volunteers/staff are trained to complete the application
- Report # of applications submitted on a monthly basis
- Receive SNAP brochures, flyers, and other outreach resources
- Ongoing support from MFBN to answer your questions and navigate challenges
- Peer to peer learning opportunities

Contact: Cyrus Turbak at cturbak@mfbn.org