



## Cuts to SNAP Threaten the Child Nutrition Programs

In July 2025, Congress passed the budget reconciliation law ([H.R. 1](#)), making detrimental and [unprecedented changes to the Supplemental Nutrition Assistance Program \(SNAP\)](#) that will lead millions of people to lose all or part of their nutrition benefits, jeopardizing their health and well-being. Many of the [cuts to SNAP](#) have the potential to impact access to the child nutrition programs, making children hungry at home and at school. As states implement these SNAP changes, it is critical for them to prioritize children's access to school meals and other federal child nutrition programs.

### The Connection Between SNAP and the Child Nutrition Programs

#### *SNAP Provides a Direct Link to Free School Meals*

Children whose households participate in SNAP are directly certified for free school meals. Direct certification leverages data and technology to automatically link children in SNAP households with free school meals, eliminating the need for a school meal application.<sup>1</sup> The process has tremendous benefits: increasing children's access to school [breakfast](#) and [lunch](#), reducing duplicative paperwork requirements for families, streamlining the administration of school meals programs, and supporting program integrity.

Furthermore, direct certification rates are the primary basis for determining which schools can utilize the [Community Eligibility Provision](#) (CEP) to offer free meals to all students. CEP provides every child in a high-need school the opportunity to experience the [benefits of school meals](#). The more children directly certified for free school meals, the more likely a school can implement CEP.

#### *SNAP Connects Children to Summer Nutrition Benefits*

The [Summer Electronic Benefit Transfer Program](#) (Summer EBT), permanently established in 2022, [reduces food insecurity](#) and improves nutrition over the summer when children lose access to school meals. Children who qualify for free or reduced-price school meals during the school year are eligible for \$120 in grocery benefits for the summer through Summer EBT.

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<sup>1</sup> Direct certification is the way that the vast majority of children whose households participate in SNAP are certified for free school meals, but families can also be certified by putting their case number on a school meal application.

Children who are directly certified for free school meals based on their participation in SNAP, Temporary Assistance for Needy Families (TANF), the Food Distribution Program on Indian Reservations (FDPIR), and in most states, Medicaid, are automatically issued Summer EBT benefits without having to complete an application.

#### *SNAP Streamlines Families' Access to WIC*

Through a mechanism known as [adjunctive eligibility](#), families who participate in SNAP, Medicaid, or TANF automatically meet the income requirement for the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC). This means that if a household meets the income requirements for one of those programs, they do not have to provide proof of income when applying for WIC, helping to streamline the process for both families and the WIC agency.

#### *Participation in SNAP Helps Boost Eligibility Data for Summer and Afterschool Meals*

Summer and afterschool nutrition programs provide meals and snacks to children during out-of-school time. To participate, sites must be located in high poverty areas, defined as an attendance area of a school where at least 50 percent of the students qualify for free or reduced-price meals.<sup>2</sup> Children in households that receive SNAP are directly certified for free school meals, and school percentages of free and reduced-price meals help to establish summer nutrition and Child and Adult Care Food Program (CACFP) site eligibility. Cuts to SNAP that reduce the number of children that are certified for free school meals may result in fewer summer and afterschool nutrition program sites being eligible to participate.

### **How the SNAP Cuts in the Budget Reconciliation Law Impact the Child Nutrition Programs**

H.R. 1 includes multiple SNAP provisions that will negatively affect school meals and other child nutrition programs. Of particular concern is the administrative and benefit cost-sharing and restrictions on lawfully present noncitizens provisions, which will cause children to lose access to SNAP, and thus, their direct access to other child nutrition programs.

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<sup>2</sup> To qualify as a summer meals site, at least 50 percent of the children in the geographic area have to be eligible for free or reduced-price school meals; or at least 50 percent of the children participating in the program at the site have to be individually determined eligible for free or reduced-price school meals; or the children served have to be primarily migrant. Once a site is determined eligible, all children who come to the site can eat for free. Summer camps also can participate, but they are only reimbursed for the meals served to children who are individually eligible for free or reduced-price school meals. Rural non-congregate sites can provide summer meals to children who are eligible for free or reduced-price school meals in areas that do not meet the 50 percent eligibility threshold. During summer school, National School Lunch Program also reimburses schools under the regular school rules, providing reimbursement for free, reduced-price, and paid meals served.

## **1. Administrative and Benefit Cost-Shifts Will Reduce Children's Access to School Meals, Summer EBT, and WIC**

Starting in October 2026 (fiscal year 2027), states will need to cover more of the administrative costs for SNAP. Historically, the federal government and states have split administrative costs equally, with states covering 50 percent of administrative costs and the federal government covering the remaining 50 percent of costs. H.R. 1 increases the state's administrative cost share to 75 percent.

Additionally, for the first time in the program's history, states will be required to cover a portion of SNAP's benefit costs, beginning in October 2027 (fiscal year 2028). The portion of benefits that states are required to cover can be up to 15 percent and is determined by [their error rate](#), which refers to the accuracy of eligibility or benefit determinations. Error rates are unintentional mistakes typically caused by understaffing, changing rules, or outdated technology in state agencies.

States may choose to control costs by limiting SNAP eligibility, which could mean fewer children will be enrolled in SNAP, thus breaking their direct link to free school meals, Summer EBT, and WIC, and causing a negative chain reaction throughout child nutrition programs. [In fact, the Congressional Budget Office \(CBO\) estimates that subsidies provided through child nutrition programs — including the National School Lunch Program — will decrease for approximately 96,000 children, because of states having to cover a portion of SNAP benefit costs.](#) Furthermore, these unprecedented cost-shifts will strain already tight state budgets, threatening states' abilities to fund other vital nutrition programs, such as Summer EBT or [Healthy School Meals for All](#).

## **2. Restrictions on Lawfully Present Noncitizens Will Reduce Children's Access to School Meals, Summer EBT, and WIC**

H.R. 1 bans specific groups of lawfully present noncitizens, such as refugees and asylees, from obtaining SNAP benefits. [CBO estimates that in an average month approximately 90,000 lawfully present noncitizens will become ineligible for SNAP benefits, including children and their families.](#) This harmful provision will sever children's direct link to free school meals, Summer EBT, and WIC, forcing families to submit cumbersome applications, increasing paperwork burdens on WIC agencies, school nutrition departments, and state agencies, and hindering schools' ability to offer all students free school meals through CEP. Children eligible for school, summer, and WIC benefits will get lost in the complicated and unnecessary paperwork requirements, resulting in increased hunger in communities seeking safety and a new life in America.

### 3. Expanded Work Requirements May Impact Children's Access to Other Nutrition Programs

H.R. 1's [work requirements](#) will put undue pressure on parents and guardians, resulting in many caregivers losing SNAP benefits. **CBO estimates that the expanded work requirements and time limits will cut approximately 2.4 million people off SNAP, 300,000 of whom are adults who live with children between 14 and 18 years old.** While the child may retain their SNAP benefits under this provision, the loss of parental SNAP benefits will worsen hunger in homes and increase children's dependence on the nutrition provided through other programs, such as school, summer, and afterschool meals. The expanded SNAP work requirements may prevent many SNAP-eligible families from participating in the program altogether, thus further disrupting children's direct certification for free school meals and adjunctive eligibility for WIC. Given the law redefined dependents as children younger than 14, this effect may be more pronounced in secondary schools where school meals participation is already lower than in elementary schools.

### 4. Thrifty Food Plan Limits Will Cause Summer EBT Benefit Inadequacy

The [Thrifty Food Plan](#) (TFP) estimates the cost of groceries that meet the [Dietary Guidelines for Americans](#) for someone on a limited food budget. TFP serves as the basis for determining SNAP and Summer EBT benefit amounts. H.R. 1 mandates that adjustments remain cost neutral. While this provision does not affect children's access to school meals, Summer EBT, or WIC, freezing TFP at a time of rising food and living costs will result in inadequate Summer EBT benefit amounts and an increase in food insecurity, particularly over the summer when childhood hunger rises.

### 5. Utility Cost Limits and Internet Cost Exclusions May Prevent Eligible Families from Applying for SNAP

H.R. 1 restricts a state option that allows shelter costs to be calculated based on household eligibility for fuel assistance. Utility costs, known as the Standard Utility Allowance (SUA), are part of the living expenses that affect monthly SNAP benefit amounts. Under H.R. 1, only households with a member who is age 60 or older or receiving disability benefits can use this option. This change will force many households without an older adult or person with a disability — including working families with children — to provide proof of utility payments, creating a heavier paperwork burden for applicants and state agencies. It would also cut SNAP benefits by an estimated [\\$5.9 billion over 10 years](#).

H.R. 1 also eliminated a recent improvement that recognized internet costs as part of the SUA. By prohibiting states from including internet expenses, H.R. 1 reduces SNAP benefit amounts further. As SNAP benefits already fall short of meeting families' basic needs, this cut may cause some households to leave the program altogether, disrupting children's automatic access to free school meals, WIC, and Summer EBT.

## **6. Elimination of the SNAP Education and Obesity Prevention Grant Program (SNAP-Ed) Dismantles Nutrition Education**

SNAP-Ed utilized evidenced-based, public health interventions to improve the health and well-being of communities across the country. Many schools partnered with SNAP educators to transform cafeterias into classrooms and implement school-based nutrition education. H.R. 1 eliminated funding for SNAP-Ed, cutting critical nutrition education resources for students, schools, and families.

### **Cuts to SNAP Hurt Children, Families, and Schools**

Children do not live in isolation; they rely on parents and caregivers to access food and nutrition programs. When a household's SNAP benefits are reduced or terminated under H.R. 1, children are directly affected, and their access to school meals, WIC, and Summer EBT is also jeopardized, threatening children's food security, growth, and development. Losing automatic eligibility for school meals, WIC, and Summer EBT will result in eligible children falling through the cracks as they struggle to navigate complicated and unnecessary paperwork processes. Multiple barriers exist that prevent families from submitting program applications. Language and literacy barriers, fear and shame, and confusion over the application itself prevent many eligible families from applying for federal nutrition benefits. And **some children will lose access to the programs altogether.** For example, children who do not attend a school that participates in school meals, such as those who are homeschooled or attend school virtually, will no longer be eligible for Summer EBT if their family no longer participates in SNAP. Some children will also lose access to free school meals, even through the application process, if they no longer participate in SNAP.

CEP adoption has grown tremendously over the last decade, with more than 54,000 schools — one out of every two that operate the National School Lunch Program — implementing CEP in the 2024–2025 school year. CEP removes school meal application barriers by relying on direct certification data, rather than school meal applications, to determine federal reimbursement for school breakfast and lunch. CEP has been a gamechanger for school meals, reducing stigma in cafeterias, eliminating school meal debt, and increasing children's access to the nutrition they need to succeed throughout the school day. As children lose access to SNAP, fewer children will be directly certified for free school meals, federal reimbursement for meals served in CEP schools will decrease, and schools will struggle to cover the cost of offering all students nutritious meals at no charge. Ultimately, some schools will be forced to drop CEP and return to the burdensome process of collecting school meal applications. This, in turn, will hinder children's access to free school meals, causing a rise in school day hunger. Likewise, decreases in direct certification could also impact sites' eligibility for summer and afterschool meals, resulting in fewer sites being able to implement these important nutrition programs.

Similarly, severing households' adjunctive eligibility to WIC [will increase barriers](#) to applying for the program. Currently, about half of those eligible for WIC participate. This large participation gap will only be exacerbated when applying for the program becomes even more difficult. Furthermore, the additional burden on WIC agencies to verify eligibility will increase administrative burdens for those offices and could potentially delay benefits for families.

### **Congress Must Repeal the Harmful SNAP Cuts**

Cuts to SNAP will increase hunger in homes, classrooms, and communities across the country. Congress must act swiftly to repeal the harmful provisions in H.R. 1 and ensure that children and their families have access to the nutrition they need to be healthy.

[FRAC encourages organizations and individuals to urge Members of Congress to support The Restoring Food Security for American Families and Farmers Act of 2025, which would repeal the devastating SNAP cuts passed in H.R. 1.](#) Congress must act now to restore SNAP, protect child nutrition, and recommit to building a nation free from hunger.

Additionally, child nutrition professionals and partners are encouraged to mitigate the harm of H.R. 1 through the following strategies:

#### **1. Conduct Robust and Comprehensive Direct Certification this School Year**

School districts are strongly encouraged to [conduct robust and comprehensive direct certification](#) throughout the 2025–2026 school year to fully capture eligible children before SNAP cuts go into effect. Once a child is directly certified for free school meals, they retain that eligibility status for the remainder of the school year, regardless of changes in household income or SNAP participation. Directly certifying as many children as possible will help ensure children retain free school meal access and support schools' ability to implement CEP in subsequent school years. Learn more about [strategies that school districts can use to improve direct certification](#).

#### **2. Expand Children's Access to School, Summer, and Afterschool Meals**

As SNAP cuts limit families' food resources and cause household hunger to rise, children will become more dependent on the nutrition provided through school meals and other nutrition programs. Schools and communities must collaborate to increase children's access to [school breakfast](#) and lunch, summer, and afterschool meals.

- Eligible schools should strongly consider implementing CEP, while those that already participate are encouraged to reevaluate their eligibility in the spring of 2026 and restart their CEP cycle to extend current reimbursement rates before SNAP cost shifts go into effect.

- Likewise, schools should implement innovative service models, such as [breakfast after the bell](#), that increase breakfast participation and help ensure students start their school day ready to learn.
- Providers and schools should reevaluate their eligibility for CACFP At-Risk Afterschool Meals and the Summer Food Service Program (SFSP) before all the SNAP cuts go into effect, as those determinations are good for five years. Similarly, CACFP and SFSP sites should take advantage of all data sources for establishing area eligibility, including using census data when applicable, as well as averaging and using CEP data as a proxy in participating school districts.
- Coordinated outreach, supportive public policies, and strategic community partnerships are key tactics to increasing participation in summer and afterschool meals.
- States can look to optimize their [applications](#) for Summer EBT to ensure streamlined access as well as find ways to improve their [outreach and communication](#) to families to ensure the program reaches as many children as possible.

Visit [FRAC.org](#) for resources on [CEP](#), school [breakfast expansion strategies](#), and best practices for increasing participation in [summer meals](#), [Summer EBT](#), and [afterschool meals](#).

### **3. Remove WIC Application Barriers**

As families' application barriers increase, states should improve outreach efforts and streamline certification for eligible families. In 2023, the U.S. Department of Agriculture released a [memo](#) identifying requirements and flexibilities to reduce administrative burdens on WIC staff and participants, while ensuring program integrity. Some of the recommendations include strengthening adjunctive eligibility determinations, simplifying documentation requirements, and providing temporary certification periods, among others. States should work to implement all the available flexibilities to ensure WIC households can access the benefits they need.

### **4. Promote the Importance of Child Nutrition Programs**

Child nutrition programs provide a lifeline for children and families in every community across the country. [WIC](#) supports the health, nutrition, and development of infants, young children, pregnant, and postpartum individuals. [School](#), summer, and afterschool meals reduce hunger and [support children's learning, health, and well-being](#). The importance of child nutrition programs cannot be overstated, and it is imperative that families, neighbors, and policymakers understand the value of child nutrition programs and what is at stake when children lose access to the nutrition they need to grow and thrive. [Join FRAC by getting vocal on social and pushing back against the harmful SNAP provisions included in H.R. 1. Together, we can build a nation free from hunger.](#)