

Proposed Legislation Goes Beyond the Federal Impacts of H.R. 1

Overview/Background

In July 2025, the U.S. Congress passed H.R. 1, titled the “One Big Beautiful Bill Act,” which included significant cuts to Medicaid financing as well as changes to Medicaid and Supplemental Nutrition Assistance (SNAP) eligibility for certain immigrant populations. H.R. 1 also added work-reporting requirements for states that have adopted Medicaid expansion, requiring that individuals aged 19–64 enrolled in Medicaid — with certain exemptions — work 80 hours per month to remain eligible for Medicaid. Additionally, H.R. 1 imposed new SNAP time limits onto vulnerable people who are not working at least 20 hours a week, such as older participants, as well as parents or other members of a household with responsibility for a dependent child under 14 years of age. It also shifted extensive costs from the federal government to states participating in SNAP by increasing each state’s share of administrative expenses and forcing states with SNAP error rates of 6 percent or higher to pay a percentage of the grocery benefits provided to eligible families.¹

Florida has proposed SB 1758/HB 1453 to align with some of the provisions of H.R. 1; however, this bill goes beyond what is required in H.R. 1 by imposing new, onerous standards on Medicaid and SNAP that would cause undue harm to Florida’s families. These provisions would exacerbate food insecurity, disproportionately increase red tape for individuals who receive these services, and stray from the federal law in imposing work requirements on non-expansion adults.

How SB 1758/HB 1453 Would Unnecessarily Increase Burdens for Families Who Receive Medicaid and Stray from Federal Law

The new federal law prohibits states from submitting waivers that institute work-reporting requirements for non-expansion adults who receive Medicaid.² SB 1758/HB 1453 specifies that any implementation of these requirements would need to be approved by a state waiver, which would ultimately not be approved at the federal level because it is illegal to create a new Medicaid work requirement for individuals who would already be exempt otherwise. The bill should be amended to eliminate these requirements entirely.

Florida does not have a Medicaid Expansion population; therefore, it is not beholden to the work-reporting requirements for adults passed under H.R. 1. SB 1758/HB 1453 would impose stringent work-reporting requirements for parents on Medicaid, while limiting the hours available to work towards these requirements. These bills propose that able-bodied parents of children aged 14–18 (SB 1758) or aged 6–18 (HB 1453) report working or attending educational programs for 80 hours per month. They also would require that these hours only be met during the standard school day. Most able-bodied adults who receive Medicaid already work.³ Data collected in states that impose these requirements shows that adding these barriers causes bureaucratic hurdles and undue coverage loss, while also creating a financial burden on the state.^{4 5}

If somehow enacted, this bill would force Florida’s working parents into a coverage gap, since the state has not expanded Medicaid — and Florida’s eligibility limit is currently 26 percent of the Federal Poverty Level for parents.⁶ This means that in order for a family of three to qualify, parents would need to make about \$8,000 annually. With Florida’s minimum wage moving to \$15 per hour in September, working 80 hours per month would increase the family’s income to \$14,000 annually, effectively disqualifying them from Medicaid coverage. In turn, this would leave them too poor to access Marketplace Insurance, which they would need \$27,320 to qualify for.

How SB 1758 Would Unnecessarily Increase Food Insecurity

Florida imposes federal SNAP work requirements in two different ways on two different sets of SNAP participants: through its mandatory SNAP Employment and Training program (SNAP E&T), and through time limits imposed on people called “Able-Bodied Adults Without Dependents (ABAWDs).” H.R. 1 changed the federal law that governs ABAWDs to expand time limit work requirements to, among others, people up to age 65 and parents or other members of a household with responsibility for a dependent child 14 years of age or older. However, H.R. 1 did not change the federal law that governs mandatory SNAP E&T work requirements.⁷ Still, SB 1758 improperly attempts to impose mandatory SNAP E&T work requirements not only onto people up to age 65 — which violates federal law — but also onto people with children 14 and older in their household. This is contrary to how Florida has previously chosen to run its SNAP E&T program.⁸

SB 1758 also aims to reduce DCF’s error rate (*i.e.*, non-fraud mistakes)⁹ in the SNAP program by mandating that DCF develop and implement a food assistance payment accuracy improvement plan to reduce Florida’s SNAP error rates to below 6 percent. Many of the required components for the plan in the bill reflect a common-sense approach to lowering those rates (*e.g.*, improved training and data sourcing). However, technological upgrades — which will require funding from lawmakers to address — will also be critical to reducing errors.

In addition, SB 1758 would tighten verification of shelter and utility costs — which DCF says¹⁰ are a source of errors made in SNAP — by prohibiting self-attestation and, instead, requiring documentation.¹¹ Although SB 1758 would require DCF to adopt policies that accommodate participants who are unable to provide documentation of shelter or utilities because they have only recently moved to their new residence, the bill neglects to address the other barriers that some participants may have that make it difficult for them to provide this documentation. Both federal and state law require that state agencies assist households in obtaining required verification when they need help, so long as the household is cooperating with the state agency.¹² The bill should be amended to also reflect that duty.

Finally, SB 1758 would also require that a family’s EBT card includes a photo of the cardholder, even though that mandate is not contained in H.R. 1. Proponents of photo IDs claim that this would allow check-out clerks at grocery stores to combat SNAP theft. However, not only has this option been shown to increase stigma and hinder the ability of people with disabilities and family members to use their benefits,¹³ studies also suggest that it is neither cost-efficient nor necessary.¹⁴

For more information, contact:

- Erica Monet Li, policy analyst, li@floridapolicy.org
- Cindy Huddleston, senior policy analyst, huddleston@floridapolicy.org

¹ Cindy Huddleston, “How Historic Cuts to SNAP Enacted by Congress Jeopardize the Food Security of Floridians in Need and the State’s Entire Program,” Florida Policy Institute, August 12, 2025, <https://www.floridapolicy.org/posts/how-historic-cuts-to-snap-enacted-by-congress-jeopardize-the-food-security-of-floridians-in-need-and-the-states-entire-program>.

² 42 U.S Code 1396(a) Sec. 7119(a)(10) <https://www.law.cornell.edu/uscode/text/42/1396a>.

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- ³ Anne Swerlick, "Medicaid Work Requirements Don't Work For Florida," February 2020, <https://www.floridapolicy.org/posts/medicaid-work-requirements-dont-work-for-florida>.
- ⁴ Commonwealth Fund, "Few Georgians are Enrolled in the State's Medicaid Work-Requirement Program," September 2024, <https://www.commonwealthfund.org/blog/2024/few-georgians-are-enrolled-states-medicaid-work-requirement-program>.
- ⁵ Georgia Budget and Policy Institute "Pathways to Coverage: Looking Back Two Years and Into the Future" October 2025, https://gbpi.org/wp-content/uploads/2025/10/PathwaystoCoverage_TwoYearsinReviewBrief_202510.pdf.
- ⁶ KFF, "Medicaid Income Eligibility Levels for Parents, 2002-2025" <https://www.kff.org/medicaid/state-indicator/medicaid-income-eligibility-limits-for-parents/?currentTimeframe=0&sortModel=%7B%22colId%22:%22Location%22,%22sort%22:%22asc%22%7D>.
- ⁷ Under SNAP E&T requirements, mandatory participants and their families face losing their SNAP as a sanction if the participant does not work or take part in a qualifying E&T program for at least 120 hours a month. Under SNAP time limit requirements, people up to age 65 can only get SNAP for three months in a three-year period if they are not working an average of 20 hours per week. Department of Children and Families, "Able-Bodied Adults Without Dependents and Mandatory Work Participants FAQ: What does it mean to be an ABAWD or mandatory work participants for food assistance?" <https://www.myflfamilies.com/services/public-assistance/abawd>.
- ⁸ Florida Department of Children and Families, "Able-Bodied Adults Without Dependents and Mandatory Work Participants FAQ: How do I know if I am an ABAWD or mandatory work participant who is subject to work requirements?," 2026, <https://www.myflfamilies.com/services/public-assistance/abawd>.
- ⁹ U.S. Department of Agriculture, "Ensuring Eligible SNAP Households Get the Right Benefits: Are the error rates the same thing as fraud?," <https://www.fns.usda.gov/snap/qc>.
- ¹⁰ Florida House of Representatives, "Human Services Subcommittee: Meeting Packet: ONE BIG BEAUTIFUL BILL ACT: CHANGES TO THE SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM," October 8, 2025, <https://www.flhouse.gov/Sections/Documents/loadDoc.aspx?MeetingId=14829&PublicationType=Committees&DocumentType=Meeting%20Packets>.
- ¹¹ DCF must also verify things such as earned and unearned income, identity, and immigration status.
- ¹² 7 C.F.R. § 273.2 (f)(5), <https://www.ecfr.gov/current/title-7/subtitle-B/chapter-II/subchapter-C/part-273/subpart-A/section-273.2#p-273.2%28c%29%285%29>. See also Fla. Admin. Code R. 65A-1.204 (1), <https://flrules.org/gateway/readFile.asp?sid=0&tid=0&cno=65A-1&caid=1678311&type=4&file=65A-1.doc>; Center on Budget and Policy Priorities, "How to Streamline Verification of Eligibility for Medicaid and SNAP," July 18, 2024, https://www.cbpp.org/research/health/how-to-streamline-verification-of-eligibility-for-medicaid-and-snap#_ftn21.
- ¹³ Office of Greg Casar, "NEWS: Congressman Greg Casar Introduces the No Photo for Food Act," September 26, 2023, <https://casar.house.gov/media/press-releases/news-congressman-greg-casar-introduces-no-photo-food-act>; Stacy Dean, "SNAP: Combating Fraud and Improving Program Integrity Without Weakening Success," Center on Budget and Policy Priorities, June 9, 2016, <https://www.cbpp.org/research/food-assistance/snap-combating-fraud-and-improving-program-integrity-without-weakening>.
- ¹⁴ Gregory Mills and Christopher Lowenstein, "Assessing the Merits of Photo EBT Cards in SNAP," Urban Institute March 2015, <https://www.urban.org/sites/default/files/publication/44641/2000159-Assessing-the-Merits-of-Photo-EBT-Cards-in-the-Supplemental-Nutritional-Assistance-Program.pdf>.