



# Oregon

Tina Kotek, Governor

ODHS Self-Sufficiency Programs  
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Salem, OR 97301



To: Co-Chair Valderrama, Co-Chair Campos, and Members of the Joint Ways and Means Subcommittee on Human Services

From: Mariya Klimenko, Legislative Coordinator, Self-Sufficiency Programs, Oregon Department of Human Services

Subject: Follow-up responses from Sept. 29, 2025, agency presentation on federal changes to SNAP

Date: October 6, 2025

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Dear Co-Chairs and Members of the Committee:

At your hearing on September 29, 2025, during Oregon Department of Human Services' presentation on an overview of the impacts of H.R. 1, Representative Valderrama asked how many people we anticipate will be eligible for Medicaid under its work requirements but not eligible for SNAP; the number of people correlating to the percentages used on the SNAP demographics slide in our presentation; and the amount of issued benefits Oregonians might have to pay back once our analysis is complete. Additionally, Senator Gelsler Blouin requested an expanded definition of the different "Indian" populations referenced, and Representative Nelson requested a list of the number and percentages of SNAP recipients per county.

The requested information is below.

## **SNAP vs. Medicaid Work Requirements**

Federal work requirements for SNAP and Medicaid are not aligned (see tables below). Due to lack of data on Medicaid work compliance, we cannot currently estimate how many may lose both SNAP and Medicaid under H.R.1.

We can, however, examine the estimated SNAP impact in several ways. Historically, 22% of those subject to SNAP's Able-Bodied Adult Without Dependents (ABAWD) rules lose benefits

and are not able to meet work requirements. Under H.R.1, with expanded age ranges and loss of waivers in all counties, we estimate that between 20–30% could lose SNAP and will be unable to meet work requirements. This could be due to a combination of factors such as job availability, transportation or older adults that are receiving a pension and don't want that impacted. Out of the 310,000 adults subject to screening, this could affect between 62,000 to 93,000 people.

## H.R.1 work requirements: side-by-side comparison

H.R.1 Requirements	Medicaid	SNAP
<b>Age</b>	Affordable Care Act (ACA) expansion adults aged 19–64 (and equivalent waiver populations).	Able Bodied Adults Without Dependents (ABAWDs) expanded to age 18 through 65 (was 18-54); adults not ABAWD only if youngest child in SNAP household is under age 14.
<b>Hours / Activities</b>	80 hours per month of qualified activities such as work, community service, education/training, or income equal to 80x federal min. wage; combinations allowed. Seasonal workers with average income over 6 months income 80 x minimum wage.	80 hours per month of work, job training/Education & Training (E&T), or approved activities (consistent with ABAWD rules). These include work for pay in exchange for goods or services or unpaid as a volunteer.
<b>Verification &amp; Compliance Timelines</b>	Verified at application (look-back up to 3 months) and at least once between renewals every 6 months (from prior 12 months); states may verify more often; 30 days to fix the problem after being notified of noncompliance. May use data provided to SNAP to meet requirement.	Maintains ABAWD time limits - may only receive benefits for a maximum of three counting months within the 3-year period (Jan 2025 – Dec 2027) unless meets work rules, meets an exception, or lives in a waived area.
H.R.1 Requirements	Medicaid	SNAP
<b>Exceptions and ways other than age that people would not have to meet work requirements</b>	<p>Parents/caretakers of children ≤13; pregnant; medically frail; tribal members/AI/AN; veterans with rated disabilities; in SUD treatment; complying with TANF/SNAP work rules; recently incarcerated; family caregivers; age &lt;19 or &gt;64. Entitled to Medicare Part A/ enrolled in Medicare Part B.</p> <p>Some optional Hardship exceptions included such as stay in inpatient hospital, nursing facility, intermediate care facility or inpatient psychiatric hospital, resided in a county with federally declared emergency or disaster, resident in county with unemployment rate above 8% or 1.5x national unemployment rate, traveled outside individuals community for an extended time for medical care for themselves or dependents.</p> <p>Adds exemption for Indians/Urban Indians, California Indians.</p>	<p>Continues exceptions: Medically certified as physically or mentally unfit for employment, pregnant, physical, mental, or behavioral health condition preventing employment (different than medically certified), lives in a federally waived area (unemployment rate above 10%), responsible for the care of an individual with an incapacity and providing the care prevents the person from obtaining or maintaining employment, student enrolled at least half-time in school, training programs, or higher education. A regular participant in a substance use disorder program. Adds exemption: Indians, Urban Indians, California Indians. Ends temporary exemptions: people experiencing homelessness, veterans, former foster youth ≤24.</p>
<b>Implementation / Dates</b>	HHS interim/final rule due by Jun 1, 2026; states must implement by Jan 1, 2027 (or earlier at state option). States may request an extension from the Secretary of State, up to December 31, 2028, if they can show they have made a “good faith” effort to comply.	H.R. 1 does not set a specific effective date for SNAP ABAWD work-requirements. States are currently waiting for federal rulemaking or guidance to clarify when these changes should begin. Current Oregon waivers end December 31, 2025.

## Population numbers to accompany demographic percentages

The data in slide 7 of the presentation (pictured below) was sourced from the Center on Budget and Policy Priorities (CBPP) [SNAP fact sheet for Oregon](#), which distills FFY 2024 data from USDA Food and Nutrition Service. The fact sheet notes that 757,700 Oregon residents participated in SNAP during that year. Based on that number and the state percentages provided:

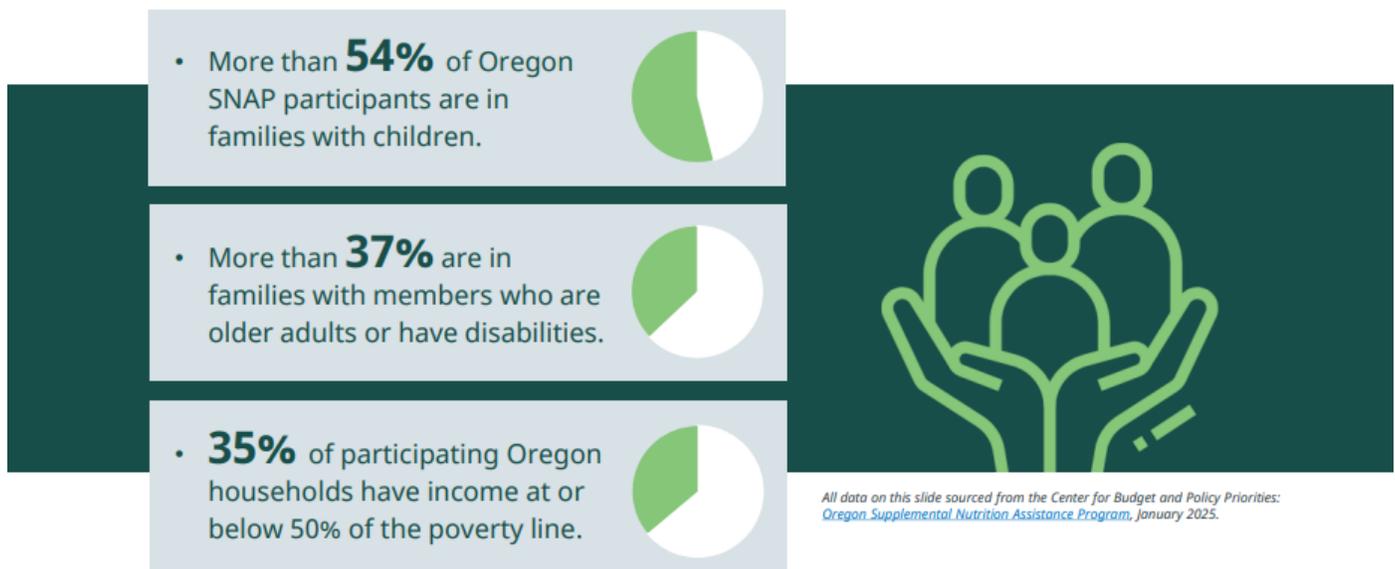
- **Approximately 409k SNAP participants** are in families with children
- **Approximately 280k participants** are in families with members who are older adults or have disabilities

CBPP does not include a total number of participating Oregon households on its fact sheet. As such the third bullet below cannot be expressed as an actual number based on CBPP-provided data. However, ODHS SNAP data indicate that in July 2025:

- We do not currently have the exact number of families currently under 50% FPL, but will follow up to provide this as soon as it is available.

ODHS can also provide point-in-time counts of SNAP households that include children or older adults. Please let us know if this is of interest to the committee.

## SNAP combats hunger and poverty



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## Definitions: “Indian,” “Urban Indian,” and “California Indian”

H.R.1 creates an exemption for people who qualify as “Indian, Urban Indian, or California Indian” from having to meet the SNAP ABAWD work rules. In other words, these individuals do not have to work 80 hours per month or more, have a child under age 14 in their SNAP group, or meet any other exemption in order to receive SNAP. This is true no matter where in Oregon that person lives or what their age is.

Under H.R. 1:

*The term “Indians” or “Indian”, unless otherwise designated, means any person who is a member of an Indian tribe, as defined in subsection (d) hereof, except that, for the purpose of sections 102 and 103, such terms shall mean any individual who (A), irrespective of whether he or she lives on or near a reservation, is 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, or (B) is an Eskimo or Aleut or other Alaska Native, or (C) is considered by the Secretary of the Interior to be an Indian for any purpose, or (D) is determined to be an Indian under regulations promulgated by the Secretary.*

*The term “Urban Indian” means any individual who resides in an urban center, as defined in subsection (g) hereof, and who meets one or more of the four criteria in subsection (c)(1) through (4) of this section.*

*California Indian: (1) Any member of a federally recognized Indian tribe. (2) Any descendant of an Indian who was residing in California on June 1, 1852, if such descendant— (A) is a member of the Indian community served by a local program of the Service; and (B) is regarded as an Indian by the community in which such descendant lives. (3) Any Indian who holds trust interests in public domain, national forest, or reservation allotments in California. (4) Any Indian of California who is listed on the plans for distribution of the assets of rancherias and reservations located within the State of California under the Act of August 18, 1958 (72 Stat. 619), and any descendant of such an Indian.*

## Potential SNAP Repayments Post-July 4

Currently, we know that Oregonians whose cases are pulled for review by Quality Control (QC) during the months of July, August, or September, who applied or renewed in one of those months, and whose eligibility was impacted by H.R.1, will have an overpayment cited against them if the overpayment for that month is more than \$57. To note: In a full year, QC reviews 0.22% of all SNAP cases. There are no repayments expected for ABAWD-related changes for July through September.

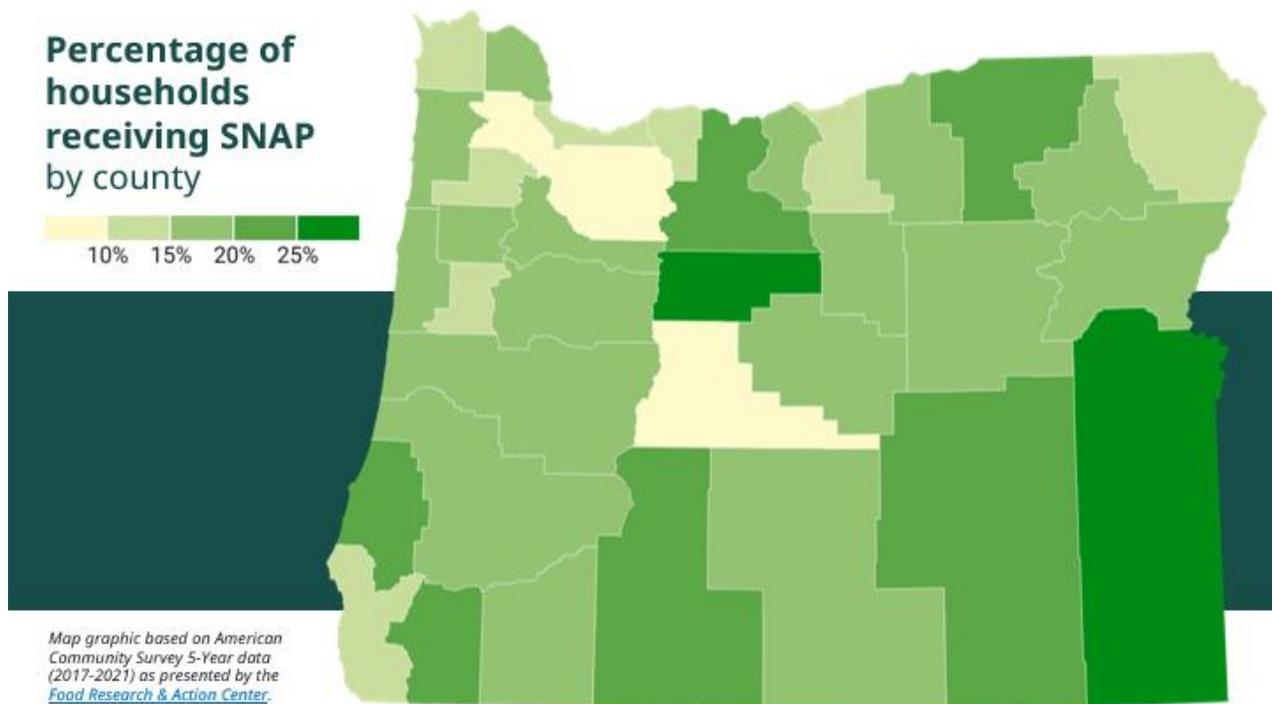
However, at this time it is unknown if Oregonians might have to pay back SNAP benefits due to the utility deduction changes or noncitizen changes. ODHS has requested guidance from USDA Food and Nutrition Service on this matter and has not yet received a response.

ODHS is required to send timely notice when reducing or closing benefits. ODHS is also required to send notice when benefits are denied or when an overpayment is established against a household. All of these notices include a person’s hearing rights, describing how they can challenge the decision or request a hearing.

### Oregonians Receiving SNAP: County-level Data

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The SNAP participation graphic presented during the hearing (see below) is based on the Food Research & Action Center’s [SNAP County Data Table](#) and reflects participation rates over five years (2017-2021).



The following SNAP caseload table shows more recent, point-in-time data (August 2025) by Oregon county.

[Report Documentation](#)

**Report Type:** SNAP Individuals  
**Report Year :** 2025 **Month:** August  
**Counties Selected:** All Counties  
**Record Count:** 36



YYYYMM	County	Total Number of Individuals	Total Number of Households	Children Aged Less Than 5	Individuals Aged 5 To 17	Individuals Aged 5 To 17 (With Allotment)	Individuals Aged 18 To 59	Individuals Aged 50 To 54 (With Allotment)	Individuals Aged 60 To 64	Individuals Aged 65 and Greater	Students of Higher Education	Homeless Individuals	Disabled Individuals
202508	BAKER	3,324	2,057	202	675	675	1,619	151	238	590	63	171	928
202508	BENTON	13,114	9,512	662	1979	1,979	8,802	436	497	1,174	3,758	850	2,430
202508	CLACKAMAS	49,550	30,073	3,735	11086	11,084	25,555	2,261	2,685	6,489	1,895	3,712	11,509
202508	CLATSOP	6,807	4,419	444	1308	1,308	3,497	375	437	1,121	174	683	1,715
202508	COLUMBIA	9,100	5,601	643	1915	1,915	4,732	383	628	1,182	209	605	2,429
202508	COOS	15,951	10,249	994	2975	2,975	8,059	787	1,206	2,717	446	1,215	4,702
202508	CROOK	4,945	2,863	388	1098	1,098	2,364	222	317	778	96	300	1,132
202508	CURRY	5,111	3,435	266	826	826	2,437	287	416	1,166	95	545	1,431
202508	DESCHUTES	24,624	15,315	1,788	5203	5,203	13,125	1,190	1,325	3,183	978	2,338	5,515
202508	DOUGLAS	27,563	16,902	1,905	5601	5,601	14,275	1,320	1,829	3,954	806	1,963	7,560
202508	GILLIAM	399	218	31	94	94	191	22	22	61	7	6	102
202508	GRANT	1,310	793	90	270	270	620	51	91	239	16	68	365
202508	HARNEY	1,407	843	95	282	282	678	67	104	249	24	62	417
202508	HOOD RIVER	2,838	1,586	228	788	788	1,310	101	131	381	98	124	489
202508	JACKSON	47,262	28,770	3,629	10512	10,512	24,469	2,025	2,509	6,144	1,787	3,874	10,473
202508	JEFFERSON	6,319	3,547	552	1535	1,535	3,106	240	349	777	112	548	1,273
202508	JOSEPHINE	25,097	15,662	1,688	5060	5,060	13,055	1,214	1,594	3,702	605	2,234	5,890
202508	KLAMATH	19,644	11,680	1,490	4302	4,302	10,266	876	1,142	2,446	912	1,369	4,777
202508	LAKE	2,006	1,197	134	406	406	961	119	156	349	33	91	578
202508	LANE	72,982	48,490	4,605	13576	13,576	40,872	3,452	4,100	9,830	5,131	6,697	18,938
202508	LINCOLN	10,240	6,676	671	1935	1,935	5,039	541	709	1,886	198	1,102	2,880
202508	LINN	27,145	16,252	2,014	6043	6,043	14,056	1,227	1,611	3,421	1,042	2,044	6,827
202508	MALHEUR	8,590	4,513	810	2376	2,376	4,115	349	440	851	243	664	1,852
202508	MARION	68,105	37,830	6,491	18283	18,283	32,651	2,566	3,048	7,633	2,134	5,116	14,043
202508	MORROW	2,060	1,155	247	566	566	906	83	87	254	34	104	393
202508	MULTNOMAH	142,971	94,214	10,175	27557	27,557	78,654	6,794	7,356	19,234	7,297	15,595	35,233
202508	POLK	14,983	8,539	1,202	3712	3,712	7,775	559	729	1,565	916	831	3,262
202508	SHERMAN	354	211	32	68	68	170	13	29	55	6	31	100
202508	TILLAMOOK	4,563	2,857	322	966	966	2,183	224	346	746	99	394	1,267
202508	UMATILLA	15,703	8,553	1,752	4299	4,299	7,190	623	707	1,756	335	886	3,226
202508	UNION	5,706	3,383	477	1228	1,228	3,101	215	284	616	486	275	1,300
202508	WALLOWA	1,055	653	63	208	208	519	41	73	192	24	46	288
202508	WASCO	5,303	3,226	412	1205	1,205	2,636	237	291	759	139	455	1,308
202508	WASHINGTON	64,409	36,817	6,049	16398	16,398	31,240	2,500	2,850	7,875	3,004	3,932	13,323
202508	WHEELER	172	120	8	23	23	70	7	17	54	3	6	52
202508	YAMHILL	15,924	9,301	1,302	3751	3,751	7,994	680	846	2,031	686	1,017	3,631

For more information, please contact Mariya Klimenko, ODHS Self-Sufficiency Programs Legislative Coordinator, at [Mariya.Klimenko2@odhs.oregon.gov](mailto:Mariya.Klimenko2@odhs.oregon.gov).