

Gone in a SNAP:

North Carolina’s Declining SNAP Participation Since H.R. 1

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Table of Contents

<i>Introduction.....</i>	<i>2</i>
<i>Snapshot of SNAP Participants in North Carolina.....</i>	<i>3</i>
<i>H.R. 1 and Declining SNAP Participation in North Carolina</i>	<i>4</i>
<i>H.R. 1’s Expanded Work Requirement</i>	<i>7</i>
<i>H.R. 1 Pushes New Costs on the State and Counties</i>	<i>9</i>
<i>New Administrative Costs</i>	<i>9</i>
<i>New Program Benefits Costs</i>	<i>9</i>
<i>Conclusion</i>	<i>11</i>
<i>Endnotes</i>	<i>13</i>

Introduction

More than 1.7 million North Carolinians faced hunger in 2024.¹ That number is poised to grow as people lose access to SNAP—the nation’s largest food assistance program—because of changes enacted last year. In recognition of September as National Hunger Action Month, this policy brief examines the decline in SNAP participation following the enactment of the federal reconciliation bill, H.R. 1, signed into law by President Trump in July 2025.

Between August 2025 and August 2026, SNAP participation in North Carolina fell by 8.5%. Participation has fallen every month and in every county in the state. Thirteen counties saw declines of 12% or more, three exceeded 15%. 116,000 North Carolinians who relied on SNAP in August 2025 no longer receive the support that keeps kids fed and pantries stocked.

While some changes have already been implemented, more are coming. Additional eligibility restrictions take effect October 1, 2026, alongside new costs for SNAP administration that have been shifted from the federal government to the states. Beginning in 2027, most states will also have to shoulder a share of the cost of SNAP benefits, even as the program grows more complex and more time-intensive to administer. Together, these changes will pile new pressure on states, and in North Carolina, onto counties—threatening SNAP’s ability to serve hungry families.

As these new changes take hold and the effects of earlier changes continue to unfold, more North Carolinians will lose the crucial food assistance they and their families depend on to stay fed and healthy. Despite big-hearted efforts, food banks, pantries, churches and other charitable groups cannot replace SNAP. More low-income North Carolinians will struggle to meet basic needs. The cost—in preventable illness, lost productivity, educational setbacks, foregone potential, hardship and hunger—will be steep.

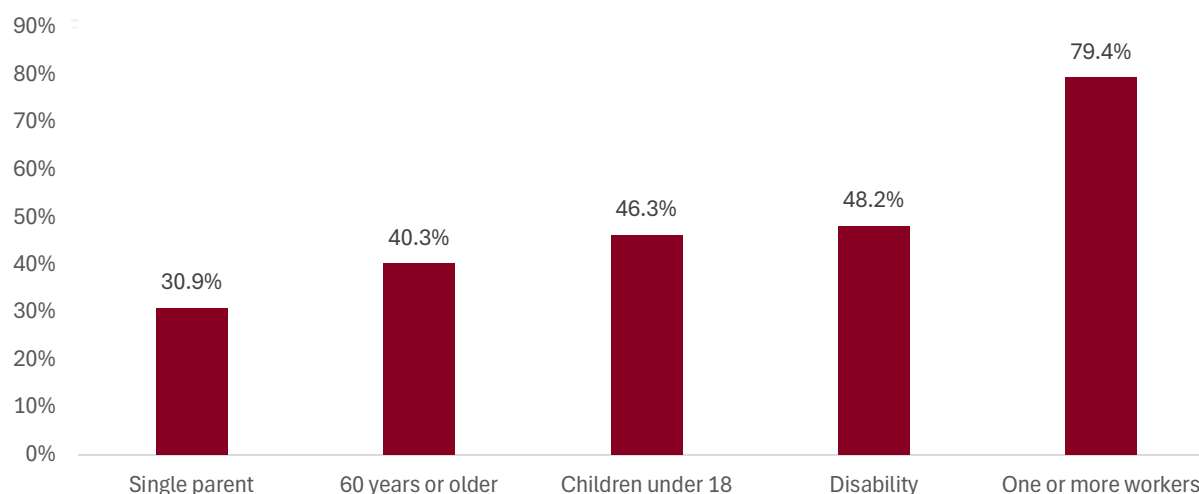
Snapshot of SNAP Participants in North Carolina

SNAP is a lifeline for more than half a million households in North Carolina. Beyond combatting hunger and improving nutrition, it lifts people out of poverty and provides long-term health, education and financial benefits.² SNAP is especially effective during economic downturns since it can expand rapidly in response to rising need while pumping money into local economies when it matters most.³

SNAP reaches across a broad cross-section of North Carolina residents. Statewide, it is an essential source of food assistance for 12.8% of households, but in 25 of the state's 100 counties, the SNAP household share rises to 20% or more.⁴ Four in five families that receive SNAP include a senior, a child or a person with a disability. Roughly one in four of North Carolina's children—more than 600,000 kids—benefit from the program.⁵ In 15 counties at least 40% of households with children are enrolled.⁶

Black and non-Hispanic White households participate in SNAP at about equal rates. SNAP plays an especially vital role in rural counties, where 16.5% of households are enrolled compared to 10.7% in urban counties.⁷ SNAP is widely used by working households. In eight out of ten families, at least one person works.⁸

Figure 1. Characteristics of Households That Receive SNAP



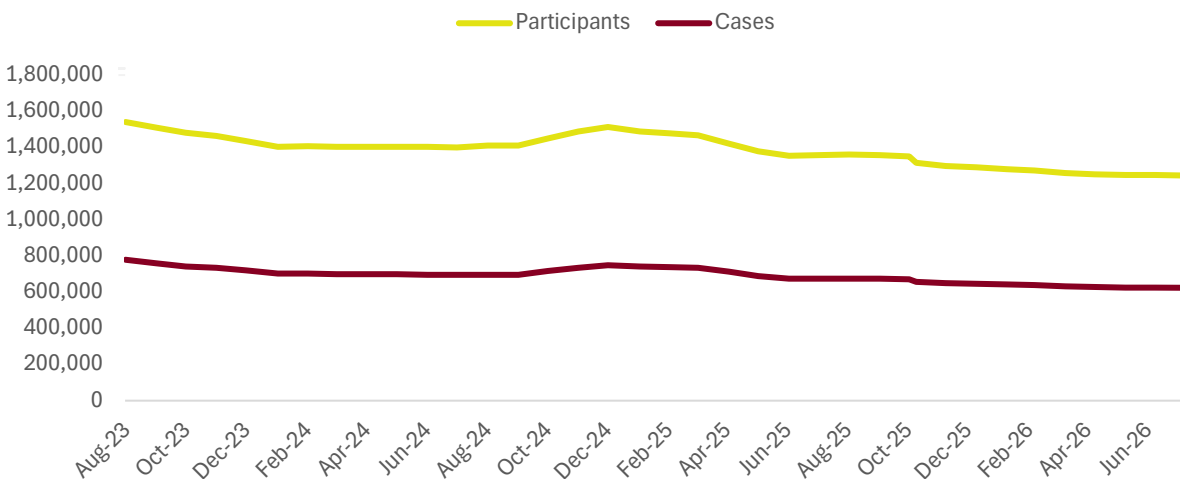
Source: 2024 American Community Survey 1-Year Estimates, S2201

H.R. 1 and Declining SNAP Participation in North Carolina

The Trump administration is dramatically reconfiguring the federal government’s commitment to food assistance. The federal reconciliation bill, H.R. 1, signed into law in July 2025, cut \$186 billion from SNAP. It also contained several changes designed to restrict SNAP eligibility, discourage participation and make it more difficult and expensive for states to administer.

Nationally, SNAP participation fell by more than 5 million people between H.R. 1’s enactment in July 2025 and June 2026.⁹ Here at home, the number of North Carolinians participating in SNAP fell by nearly 116,000 between August 2025 and August 2026. Enrollment held relatively flat through September 2025, then began dropping in October and continued declining through August 2026, the most recent month for which data is available (Figure 2).¹⁰

Figure 2. Number of SNAP Participants and Cases in North Carolina, August 2023-August 2026



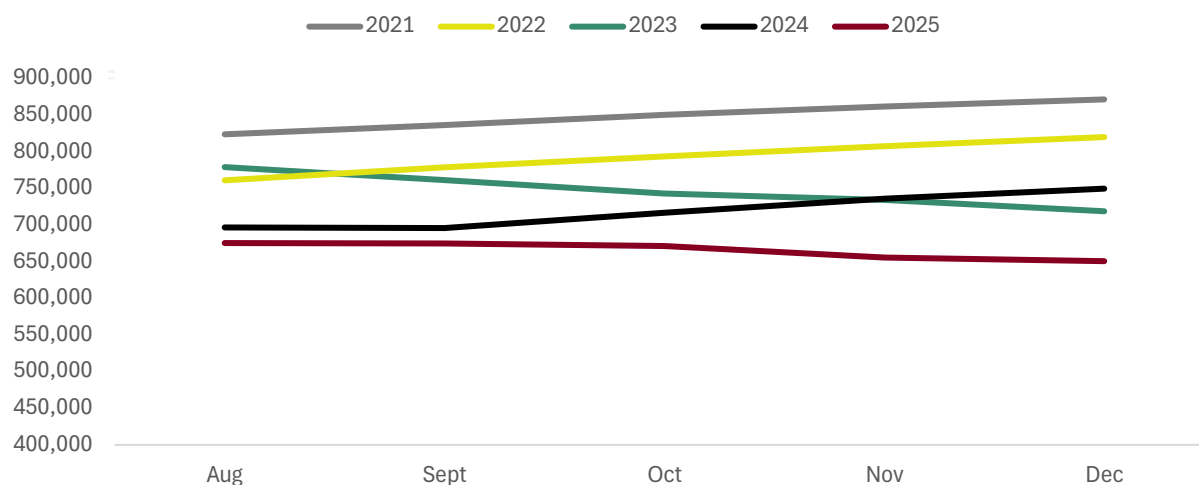
Source: NC DHHS, Food and Nutrition Services

North Carolina began implementing changes to SNAP’s work requirement—the rules that tie SNAP eligibility to work or participation in other qualifying programs—in November 2025, with the full requirements taking effect December 1. The decline in enrollment between August and November can’t be directly attributed to these new rules. However, the fact that participation kept falling in the months that followed points to them as a key contributor.

It's also worth noting that October and November 2025 were a tumultuous period for SNAP at the state level. North Carolina's Department of Health and Human Services (NC DHHS) and county departments of social services were racing to implement H.R. 1's changes within a very compressed timeline. The federal government didn't issue clear guidance on the work requirement until October 3, leaving North Carolina less than two months to update its computer systems, train staff and notify current participants before the December 1 start date.¹¹ At the same time, the federal government shutdown, which began October 1, created significant disruption and uncertainty around the delivery of SNAP benefits.¹² The sharp drop in November 2025 (visible in Figure 2) occurred during this chaotic period.

The uninterrupted slide in SNAP participation at the end of 2025 is also a break from recent years. Typically, SNAP enrollment grows in the last few months of the year, even when annual enrollment declines overall. In contrast, participation in 2025 fell throughout this period (Figure 3). Enrollment dropped by 25,000 cases, representing more than 61,000 people, between August and December.

Figure 3. Number of SNAP Cases in North Carolina, August-December by Year



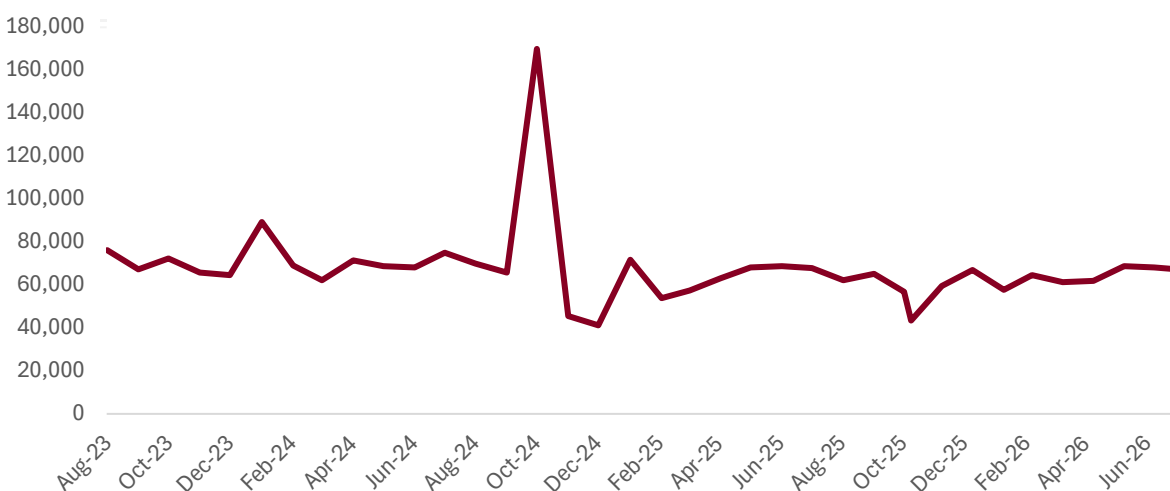
Source: NC DHHS, Food and Nutrition Services

Note: In 2023, pandemic-era accommodations that eased access to SNAP ended in July.

Little evidence supports the idea that this decline reflects a broad improvement in the economic circumstances of low-income North Carolinians. The state's unemployment rate in mid-2026 was roughly unchanged from mid-2025 level;¹³ average hourly earnings declined slightly;¹⁴ and consumer prices rose 3.4% from August 2025 to August 2026.¹⁵ Food insecurity remains widespread both nationally and in North Carolina.¹⁶ It's doubtful that 2026 ushered in the kind of economic improvement that would lead so many North Carolinians to walk away from SNAP on their own.

If the SNAP decline reflected reduced demand, it would likely show up as fewer applications. It doesn't. Setting aside a spike in late September 2024, when Hurricane Helene swept through western North Carolina, applications have held steady for several years. The number of people applying in August 2026 was very similar to August 2025 and August 2024 (Figure 4).¹⁷

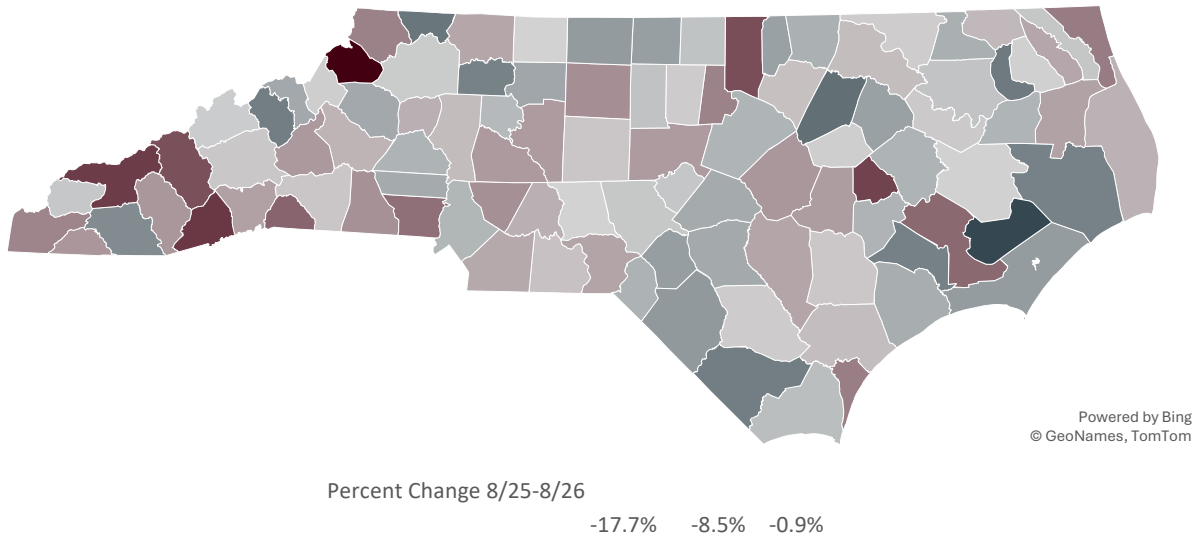
Figure 4. Number of SNAP Applications in North Carolina, August 2023-August 2026



Source: NC DHHS, Food and Nutrition Services

SNAP participation fell in all 100 counties, though at widely different rates—from a low of .9% in Pamlico County to a high of 17.7% in Watauga County (Map 1). Several other mountain counties, including Swain, Haywood and Transylvania, also saw notably steep one-year declines. Granville County, on the Virginia border, and Greene and Craven counties in the east experienced substantial drops in enrollment as well.

Map 1. Change in SNAP Participation by County, August 2025 to August 2026



Source: NC DHHS, Food and Nutrition Services

The counties with the steepest declines are all rural. Aside from that, and a small cluster in western North Carolina, they share no obvious geographic or economic profile. This variation suggests county-level declines stem from a mix of factors, such as the composition of each county's caseload (the share of households affected by the work requirement for example), the availability of local jobs and county-level administrative capacity.

H.R. 1's Expanded Work Requirement

SNAP participants must work or participate in other qualifying programs for 80 hours a month unless they fall into a specific exemption category. Those who fail to meet this requirement can receive benefits for only three months in a three-year period.

One of H.R. 1's most consequential changes was its expansion of the work requirement. More older adults are now covered (up to age 64 from 54 previously), and participants with dependents ages 14 to 17 are no longer exempt. H.R. 1 also eliminated exemptions for several vulnerable groups, including veterans, people experiencing homelessness and youth aging out of foster care.

An extensive body of research shows that work requirements do little to increase employment but effectively reduce SNAP participation.¹⁸ As noted above, most SNAP families are already working. But many face challenges to steady employment that work requirements fail to address: their employer won't give them more hours, their job prospects are limited, they lack transportation, or they're contending other barriers largely outside their control. These participants can't simply "get a job." If it were that easy, they would have done it already.

Work requirements can also push people off SNAP because they're poorly matched with the precariousness of low-wage work. The seasonal, part-time or informal work held by many low-wage workers rarely provides the steady, predictable hours the requirement assumes. Someone might work a lot during certain months and not others, or have a schedule that fluctuates from week to week. A sick day, slow week or canceled shift can bring a month's total below the 80-hour threshold.

Meeting the work requirement is only half the battle. SNAP participants must then collect and submit proof of hours every month, a complicated and time-consuming process. Workers have to stay on top of multiple jobs or obtain proper documentation. Gig work, self-employment or other qualifying activities don't necessarily come with a neat pay stub that would satisfy the rule. Not being able to reach a caseworker, the internet going out or just struggling to navigate the process can cause a person to fall out of compliance.

Many people who qualify for an exemption can't prove it, whether due to confusing paperwork, a burdensome approval process or a caseworker who doesn't understand. Some have health conditions that limit their ability to work at least some of the time, even though they are not formally classified as having a disability.¹⁹ Proving a disability, whether by obtaining disability insurance or medical documentation, can take years of persistent effort.²⁰ Others have commitments that are not recognized exemptions, such as juggling jobs and caregiving or school.

While a common rationale for the work requirement is to "encourage" adults to work, it's often children who suffer when a family loses SNAP. Between July 2025 and September 2026, children in 25 states accounted for 43% of all people who lost benefits.²¹ And children whose families no longer receive SNAP are not automatically re-enrolled in schools' free meal and summer food programs, causing a sharp drop in participation in these programs as well.²²

SNAP participation also affects whether schools can offer free meals to all students. If SNAP enrollment among the school's students drops below 25%, it can jeopardize that school's eligibility for the universal free meal program. The Miami-Dade School District in Florida has already announced it will no longer offer free lunches system-wide.²³ Nationally, over 18 million students could lose access to free meals,²⁴ which have been shown to improve students' access to food, ability to learn and long-term success.²⁵

H.R. 1 Pushes New Costs on the State and Counties

While the new work requirements may be driving most of today's SNAP participation decline, other changes—some already in effect, others still to come—will place new financial pressure onto North Carolina and its counties. Counties in particular are facing intense fiscal strain and will have to make hard budget decisions over the next few years, decisions that could further restrict access to SNAP.

New Administrative Costs

Starting in October 2026, H.R. 1 shifts a much larger share of SNAP's administrative costs onto the states—from 50% to 75%, with the federal government's share dropping to just 25%. This shift is expected to cost North Carolina \$12 million in fiscal year 2027 (July 1, 2026-June 30, 2027) and \$16 million in fiscal year 2028.²⁶

North Carolina's counties, whose local departments of social services administer SNAP, will bear the brunt of this administrative cost: an additional \$69 million this fiscal year alone.²⁷ At over \$8 million, Mecklenburg County's bill is the largest, but smaller, less affluent counties may take a harder hit. Some are already eliminating staff positions, cutting spending and dipping into reserve funds in response.²⁸

New Program Benefits Costs

Beginning in October 2027, North Carolina faces an even bigger change. For the first time the state may have to pay a share of SNAP *benefits*. This marks a major shift in funding responsibility for a large federal program. Under H.R. 1, the amount a state pays depends on

its payment error rate—the share of SNAP dollars that federal review finds were issued incorrectly (Table 1).²⁹

Table 1. Share of Benefit Cost Shifted to States

Payment Error Rate	State Picks Up
Less than 6%	No extra cost for state
6% to less than 8%	5% of benefits
8% to less than 10%	10% of benefits
10% or higher	15% of benefits

Note: H.R. 1 allows states with exceptionally high error rates to delay cost-sharing until fiscal year 2029 or 2030.

Setting aside other concerns with this approach,³⁰ tying a state's cost share to its payment error rate replaces a stable, predictable arrangement with uncertainty and inconsistency. The error rate itself is a shaky metric—the sample selected for review is very small and the statistical margin around it can be so large that it spans several cost-sharing categories. As an example of what that means in practice, North Carolina's official error rate in 2023 was 9.7%. If the cost share had been in place, the state would have paid 10% of benefit costs. But because the margin of error around that rate ran from 7.5% to 12%, a different sample could have easily placed the state in the 5% or 15% category instead. As one analysis put it, "random chance will substantially contribute to determining what a state will be required to pay in SNAP benefits."³¹

The rate also fluctuates from year to year. North Carolina landed in a different cost-sharing category in each of the last three years the rate was published, making budget planning virtually impossible.³² Faced with the prospect of large but highly variable costs, some states may respond by restricting eligibility, reducing benefits or leaving the program altogether.³³

Taking a cue from the federal playbook, North Carolina passed a law providing that if the state has to pay a share of SNAP benefits, counties must shoulder that expense *in addition* to the new administrative costs.³⁴ At the same time, county departments of social services, some of which are already understaffed,³⁵ are tackling heavier workloads and growing program complexity—and a higher risk of error—due to H.R. 1.

As county departments come under increasing strain, their ability to process applications, conduct recertifications and manage caseloads efficiently will suffer. More SNAP participants may fall through the cracks, losing vital food assistance as a result. And because SNAP is a mandatory expense that counties must fund, less money will be available for the discretionary programs and services counties also provide.³⁶

Conclusion

H.R. 1 contains lesser-known changes that will shrink SNAP further. It revoked eligibility for some categories of lawfully present noncitizens, including asylum seekers and refugees (undocumented immigrants were not eligible before H.R. 1). The US Department of Agriculture (USDA), the federal agency that administers SNAP, is no longer required to periodically reevaluate the Thrifty Food Plan—the formula for calculating SNAP benefits—effectively freezing it in place and putting it increasingly out of step with current nutritional guidance, consumption habits and the real cost of food.

The Trump administration has also cut funding for other types of food assistance. The USDA abruptly cut \$500 million in funding for a program that supplies food banks nationwide with millions of pounds of fresh meat, eggs and dairy, and canceled about \$1 billion in funding for programs that support farmers, food banks and schools.³⁷ It's also advancing a rule that will push convenience stores and other small retailers out of the SNAP program, leaving some communities without their only accessible source of groceries.³⁸ Calling it "redundant, costly, politicized" and nothing more than "subjective, liberal fodder," the USDA terminated its long-running food insecurity survey, the federal government's official measure of how many Americans go hungry.³⁹

All these changes, whether sweeping or behind the scenes, paint a portrait of an administration with little interest in lifting Americans out of hunger. A growing number of North Carolinians will lose reliable access to food, even as they're being squeezed by rising prices and flat wages. But people still need to eat, and food banks and local pantries are where many of them will turn.

Gone in a SNAP

The need is already overwhelming, breaking records set by the pandemic.⁴⁰ But charitable food assistance can't close the SNAP gap, despite committed and selfless work. For every one meal a food bank provides, SNAP provides nine.⁴¹ It operates at a scale that only the federal government can support. We could eliminate hunger in this country if we wanted to. Instead, the federal government's retrenchment of SNAP—and its obligation to food assistance more generally—will inflict hardship now and lead to greater deprivation and real social costs in the future.

Endnotes

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³⁵ Kate Martin, "NC Counties Struggle to Find Qualified DSS Workers," *Carolina Public Press*, December 27, 2023, <https://carolinapublicpress.org/62674/nc-counties-struggle-to-find-qualified-dss-workers-2/>.

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³⁷ Rachel Askinasi, "The USDA Cut \$500 Million in Funding to Food Banks. Here's How They're Coping.," *NBC News*, April 9, 2025, <https://www.nbcnews.com/news/us-news/food-banks-usda-cuts-impact-rcna200482>; Aimee Picchi, "USDA Cancels \$1 Billion in Funding for Schools and Food Banks to Buy Food from Local Suppliers," *CBS News*, March 13, 2025, <https://www.cbsnews.com/news/usda-cancels-local-food-purchasing-food-banks-school-meals/>; Ruth Talbot and Nicole Santa Cruz, "Trump Canceled 94 Million Pounds of Food Aid. Here's What Never Arrived.," *ProPublica*, October 3, 2025, <https://projects.propublica.org/trump-food-cuts/>.

³⁸ Hope Kirwan, "A Trump Administration Policy Could Force Thousands of Retailers to Stop Accepting SNAP Benefits," *Environment & Agriculture, KCUR*, June 5, 2026, <https://www.kcur.org/environment-agriculture/2026-06-05/stores-food-snap-rural-areas>.

³⁹ U.S. Department of Agriculture, "USDA Terminates Redundant Food Insecurity Survey," September 20, 2025, <https://www.usda.gov/about-usda/news/press-releases/2025/09/20/usda-terminates-redundant-food-insecurity-survey>.

⁴⁰ Clayton Henkel, "Hunger Crisis Widens in North Carolina as Food Banks Face More Demand, Federal Cuts," *NC Newsline*, September 3, 2026, <https://ncnewsline.com/2026/09/03/hunger-crisis-widens-in-north-carolina-as-food-banks-face-more-demand-federal-cuts/>.

⁴¹ Henkel, "Hunger Crisis Widens in North Carolina as Food Banks Face More Demand, Federal Cuts."

About the Poverty Research Project

The Poverty Research Project is part of The Justice Institute at North Carolina Central University School of Law. Its mission is to examine and document poverty and poverty-related issues in North Carolina, raise awareness of barriers to economic security, serve as a resource for individuals and groups interested in these topics, and provide training and mentorship for students at NCCU and elsewhere.

Website: <https://www.nccu.edu/law/academics/poverty-research-project>

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