

# **Change and Uncertainty**





Cut federal taxes

Scale back mandatory programs

Reduce or eliminate discretionary grants

Shrink the federal footprint



# There are many ways to cut federal spending

Executive orders	Restructuring, layoffs	Regulations	Guidance
FY 2025 spending plans	"Pauses"	Rescissions	Cancellations
Eliminations	Reconciliation	Debt ceiling	FY 2026 appropriations



## What was FY 2025 reconciliation used for?

Action	Reconciliation
Increase/reduce mandatory spending	$\overline{\checkmark}$
Modify mandatory programs, including Medicaid/ACA/SNAP	
Rescind IRA unobligated balances	$\overline{\checkmark}$
Repeal IRA tax provisions	$\overline{\checkmark}$
Cancel/eliminate IRA programs	$\overline{\checkmark}$
Extend TCJA	$\overline{\checkmark}$
Tax breaks for tip income, overtime pay, car loan interest	$\overline{\checkmark}$
Raise the debt limit	



## Big-picture reconciliation impacts: direct

#### Federal tax cuts

- Temporary tax cuts are front-loaded: overtime, tips, cars, seniors
- Impact depends on if and how a state links to federal tax code

### Spending cuts

• In contrast to tax cuts, these are back-loaded: post-2026 midterms

#### **IRA** rescissions

- Most programs and most tax policies cancelled
- A few big grant programs survived

### Other mandatory programs

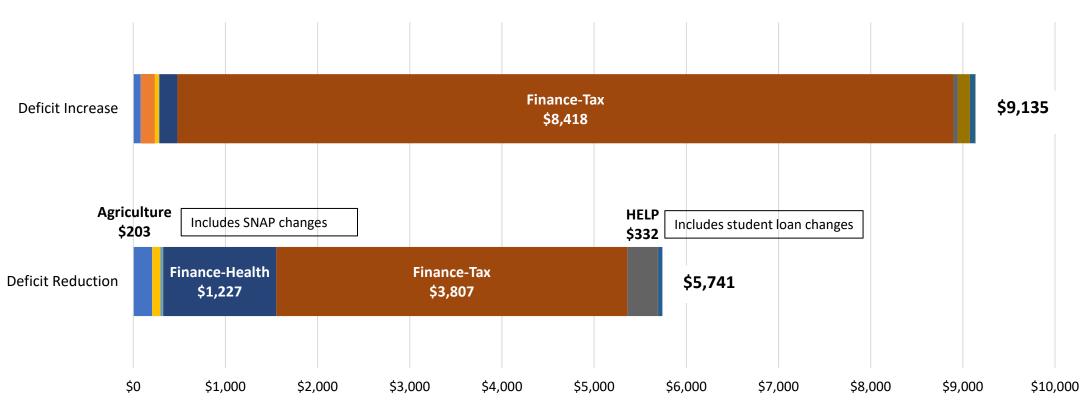
Several programs received appropriations (DHS, DOJ, USDA)





#### **10-Year Deficit Impact of One Big Beautiful Bill Act**

(\$ in billions)



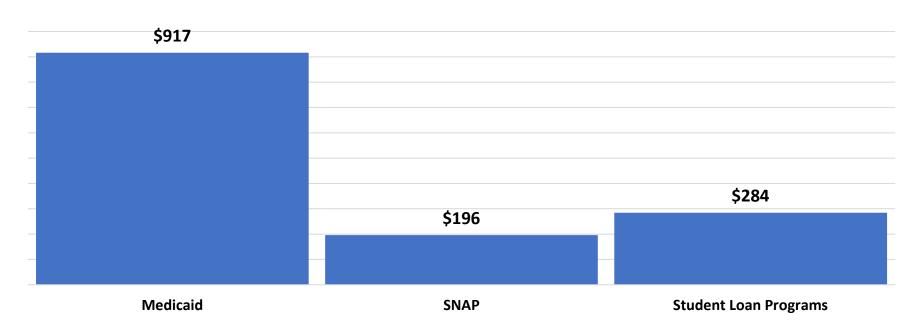
Source: Congressional Budget Office





#### **Estimate of 10-Year Cut in Federal Programs**

(\$ in billions)



Source: Congressional Budget Office

## Medicaid



Restrictions on financing, eligibility, benefits, and enrollment

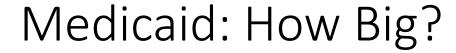
More than 50% of savings come from expansion state provisions

Most cuts occur in two waves: enactment and January 1, 2027

Increase uninsured by at least 10 million by 2034

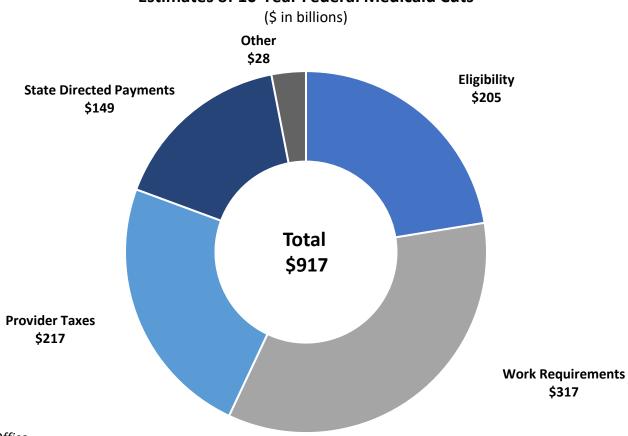
Significant administrative and system challenges for states

Limited implementation funding









Source: Congressional Budget Office





### Biggest cuts come in two waves:

- Enactment
- January 1, 2027

#### **Enactment:**

- Financing: Moratorium on provider taxes, revised payment limits for state-directed payments (Jan. 2028 for reduction in existing payments), modification of uniform tax requirement
- Probits implementation of final rules (eligibility rules, nursing home minimum staffing)

### January 1, 2027:

- Work requirements
- Several eligibility changes



# Medicaid: Other key dates

**10/1/25**: Rural Health Transformation Program (\$50B in formula grants)

**10/1/26**: Eliminates expansion FMAP for emergency Medicaid

**10/1/27**: Amends hold harmless safe harbor threshold for expansion population

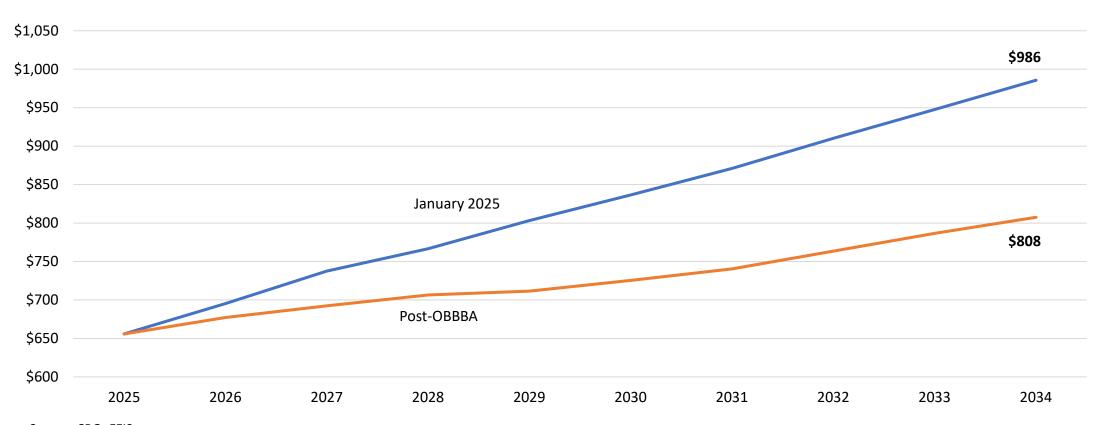
10/1/28: Cost sharing for expansion adults



# Medicaid growth slows

#### **Estimated Federal Medicaid Outlays Pre- and Post-OBBBA**

(\$ in billions)



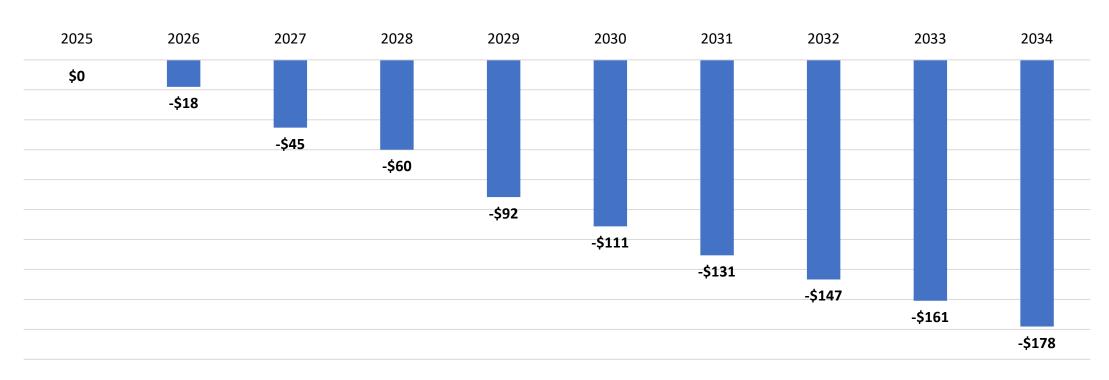
Source: CBO, FFIS



# Medicaid reductions by year (federal)

#### **Estimated Changes in Federal Medicaid Outlays from OBBBA**

(\$ in billions)



Source: CBO, FFIS



# Key takeaways

#### **Benefits**

- Decline in enrollment leads to lower projected state expenditures for benefits; impacts vary by state (CBO)
- Savings from enrollment reduction largely offset by changes in SNAP
- Limits on provider taxes and state directed payments will reduce resources for remaining enrollees
- Total state costs depend on responses to replace federal resources

#### **Administration**

- Uncertainty on spending growth: eligibility determinations, work requirements, compliance
- New funding unlikely to cover new costs



# Some help on the way

### Rural Health Transformation Program

- \$10 billion/year, FYs 2026-2030
- Guidance expected early September
- Minimum \$100 million per state; no match

### Work requirements implementation grants

- \$200 million, FY 2026
- Guidance by end of calendar year 2025
- 50% distributed equally, 50% by enrollment

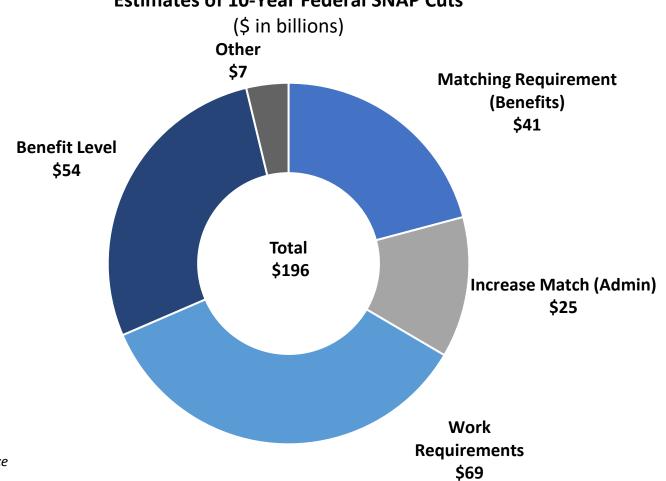
#### **HCBS** expansion

- Voluntary
- \$100 million for formula grants, FY 2027









Source: Congressional Budget Office





#### Enactment

- Limits updates to **Thrifty Food Plan**, which are the basis for calculating benefits
- Work requirements strengthened (raises age from 54 to 64, modifies definition of dependent child to under 14, allows waiver for AK and HI)
- Limits utility allowance; eliminates internet expenses in shelter deduction
- Benefits available only to citizens, permanent lawful residents, a few others

#### October 1, 2025

Allows the National Education and Obesity Prevention Grant Program to expire

### October 1, 2026

• State share of administrative costs increases to 75% (from 50%)

### October 1, 2027

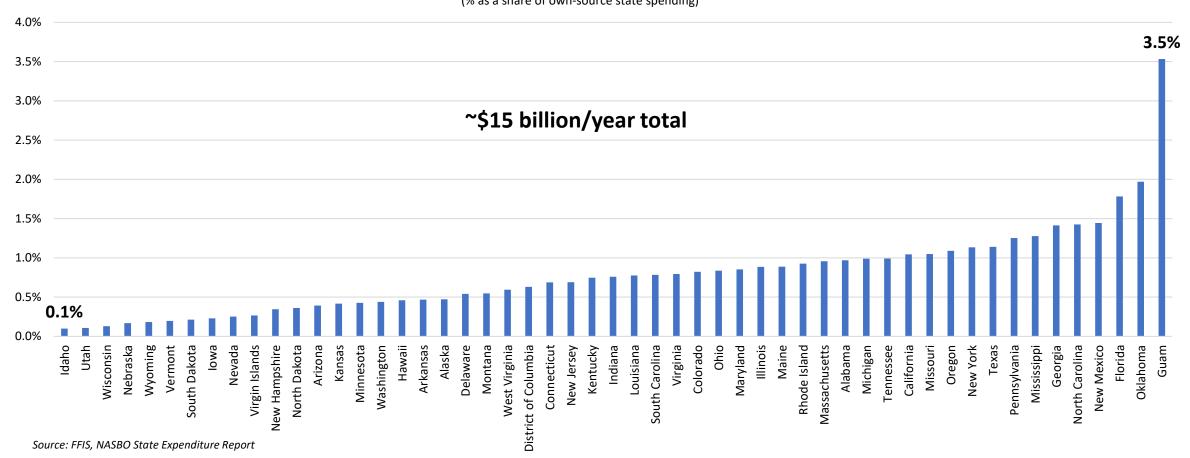
• Requires states with an error rate >6% to contribute at least 5% (and up to 15% based on error rates); delayed implementation for states with high error rate



## SNAP cost shift to states

#### **Estimated New SNAP Costs Based on FY 2024 Spending and Error Rates**

(% as a share of own-source state spending)







#### What is PAYGO?

- Prevents legislation from increasing deficit over a five- or 10-year period
- Resulting sequestration would exceed the total amount of funding for all nonexempt mandatory programs combined
- Congress has always enacted a fix (e.g., 2017 tax cuts, ARP, IRA); 60 votes required in Senate

### What is the impact on grants?

- Effectively eliminates funding for non-exempt programs for at least 10 years (Vocational Rehab, SSBG, Promoting Safe and Stable Families, MIECHV, portion of highway funding)
- Most mandatory funding is exempt (Social Security, Medicaid, and open-ended entitlements); Medicare capped at 4%; discretionary funding unaffected





#### 2025 Spend Plans and State Allocations

- Mandated by FY 2025 CR; no reports
- Some detail included in President's Budget, but most were never published
- Enacted level is unknown for scores of grants
- Lots of missing 50-state numbers

#### **Impoundment**

- More grant announcements, but some with 1-2 week application periods
- GAO rulings on legality of withholding funds; efficacy TBD
- Pressure from states seems to work
- Pocket rescissions; legality is being tested
- Much is unknown; will apportionment data help?





### President's budget

- Topline: FY 2026 budget increases defense discretionary by 13%; cuts non-defense discretionary by
  23%
- 193 grants (\$107B) identified for elimination

#### House

- Topline: Level funding for defense, ~6% cut to nondefense
- Most committee work complete, but early August recess forced a pause

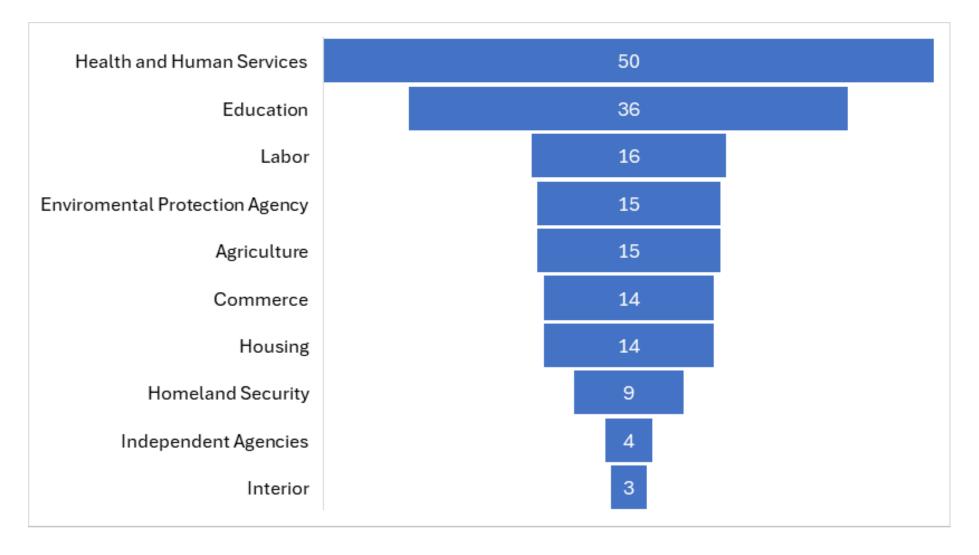
#### Senate

- No topline agreement, but committee approved bipartisan bills
- More funding compared to House; roughly FY 2025 level

Enacting final appropriations will be a challenge—bipartisan support needed in Senate









# Congressional pushback

 Senate has strong words for executive actions in appropriations report (HHS, ED, EPA, Interior)

 Impoundment, grant cancellations, agency reorganization & elimination, transparency, congressional intent, adherence to spending funds as appropriated

House less so, but concerns exist



# Appropriations Status

FY 2026 Appropriations Progress		
	Approval Status	
Appropriations Subcommittee	House	Senate
Defense	Р	С
Energy and Water	С	
Labor/HHS/Education		С
State/Foreign Operations	С	
Agriculture	С	Р
Commerce/Justice/Science	S	С
Interior and Environment	С	С
Military Construction/Veterans	Р	Р
Transportation/HUD	С	С
Legislative Branch	С	Р
Financial Services/General Gov.	S	
Homeland Security	С	
P=Full chamber; C=Committee; S=Subco	ommittee	

## Other issues on our radar



### Shutdown

- What will the administration's approach be?
- Contingency Plans?
- Timing? Conventional wisdom may not apply

### **Funding cuts**

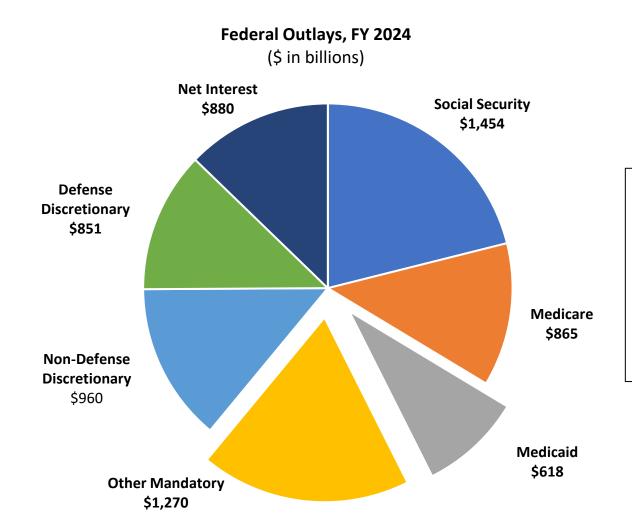
- FY 2025 rescission packages
- Reconciliation FY 2026

#### **FEMA**

- A return to past proposals?
- Total Taxable Resources, disaster deductibles, or something new?







#### Other Mandatory:

- TANF
- SNAP
- Child Nutrition
- SSI
- EITC
- Federal Retirement

Source: President's Budget, FY 2026





Reconciliation	FY 2025; enactment complete, implementation underway		
	Can do again in FY 2026 (more cuts promised)		
Appropriations	FY 2025: the lost year?		
-	FY 2026 holds peril (rescissions, eliminations, consolidations, shutdown)		
	Bipartisan support needed in Senate		
<b>Executive Grant Actions</b>	How will impoundment/court cases play out?		
-	Will actions continue?		



## FFIS resources

- Reconciliation Spreadsheet
- Reconciliation Updates
- Executive Grant Actions Tracker
- Federal Budget Updates
- Government shutdowns
- Infrastructure Investment and Jobs Act (IIJA)
- Inflation Reduction Act (IRA)





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