

Contra Costa County Employment & Human Services Department

Federal & State Impacts

As of August 4, 2025

#	FEDERAL IMPACTS	CONTRA COSTA COUNTY IMPACTS
1.	Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA); Interpretation of “Federal Public Benefit” (July 14, 2025)	<p>As of July 14, 2025, the Department of Health and Human Services (HHS), the United States Department of Agriculture (USDA), the Department of Education (DOE) and the Department of Justice (DOJ) issued separate Federal Notices of Public Rulemaking (NPRM) regarding the Personal Responsibility and Work Opportunity and Reconciliation Act (PRWORA). The USDA, DOE and DOJ notices did not accept public comments. The HHS notice is effective immediately, though is accepting public comments through August 13, 2025.</p> <p>Programs newly categorized as a “public benefit program”:</p> <ul style="list-style-type: none"> • Head Start; • Title II of the Workforce Innovation and Opportunity Act of 2014 (WIOA) and career and technical education (CTE) programs; • Community Services Block Grant (CSBG); • Title IV-E programs (Educational and Training Voucher Program, Kinship Guardianship Assistance Program and Prevention Services Program); • USDA licensing, grants, payments and loan programs <p>EHSD programs currently categorized as “public benefit program”</p> <ul style="list-style-type: none"> • Adoption Assistance; • Child Care and Development Fund; • Foster Care; • Independent Living Program; • Low Income Home Energy Assistance Program (LIHEAP); • Medicaid (except assistance for an emergency medical condition); • Refugee Cash Assistance; • Refugee Medical Assistance; • Refugee Unaccompanied Minors Program; • Repatriation Program; • Social Services Block Grant (SSBG); • Temporary Assistance for Needy Families (TANF); • Supplemental Nutrition Assistance Program (SNAP). <p>PRWORA limits access to 8 categories as listed below.</p> <p>Currently eligible and remain eligible (per National Immigration Law Center)</p> <ul style="list-style-type: none"> • Lawful permanent residents or people with green cards • Refugees and people granted asylum • People granted withholding of deportation/removal, conditional entrants • People granted parole by the Department of Homeland Security (DHS) for a period of at least one year • Cuban and Haitian entrants • Certain abused immigrants, their children and/or their parents • Certain survivors of trafficking • Individuals in the US pursuant to a compact of free association (COFA) <p>Currently eligible and no longer eligible (per National Immigration Law Center)</p> <ul style="list-style-type: none"> • People with temporary protected status • Applicants for adjustment to Legal Permanent Resident (LPR) status with approved visa petitions • Applicants for asylum or withholding of deportation/removal • People paroled for less than one year, with deferred enforced departure, or deferred action • Special immigrant juveniles • U Visa Holders • People with valid nonimmigrant status or nonimmigrant visas • Longtime residents

Contra Costa County Employment & Human Services Department

Federal & State Impacts

As of August 4, 2025

		<ul style="list-style-type: none"> • People under an order of supervision who have employment authorization • People granted family unity • Applications for the following status who have been granted employment authorization: cancellation of removal or suspension of deportation, adjustment under the LIFE Act, lawful temporary residents and applicants for legalization under IRCA, registry <p>Currently eligible and no longer eligible (per the CA Welfare Directors Association)</p> <ul style="list-style-type: none"> • Deferred Action for Childhood Arrivals (DACA) • Individuals granted employment authorization • Individual with non-immigrant visas
2.	H.R. 1: SNAP Administrative Cost Share raises state/county contribution from 50 to 75% (10/1/2026)	States and the Feds currently share the cost of administering SNAP 50%/50%. Effective 10/1/26, the Feds will only pay 25% leaving states with 75%. In California, the state pays 70% of administrative costs and counties pay 30%. The state has signaled this ratio will remain meaning cost <u>will rise for counties</u> . POTENTIAL LOCAL IMPACT: In FY25/26, Contra Costa County share is \$7,387,572. A 25% increase would be an additional ~\$1,846,893 per year assuming no change in caseload.
3.	H.R. 1: New SNAP Benefit Cost Share for States based on Error Rate Tier (10/1/2027)	For the first time ever, states are required to share the cost of SNAP benefits (effective 10/1/27) based on state error rate. CA is currently in highest error rate category equivalent to a 15% state share (~10% state-wide error rate). It is unknown if the state will pass this to counties at all, and if they do, if it may be based on county error rate. POTENTIAL LOCAL IMPACT: In 2024, Contra Costa County issued \$244,941,947 in CalFresh benefits. An annual county share 15% would be ~\$36,741,292 assuming no change in caseload.
	H.R. 1: SNAP Work Requirements	Existing Waivers of work requirements are removed for ages 50-64, parent with dependent child ages 14-17, unhoused, veterans, youth aged out of foster care at 18 and currently under 24. Local impact unknown yet.
4.	H.R. 1: Medicaid & SNAP Immigrant Eligibility Limited (10/01/2026)	As referenced above under PRWORA.
5.	H.R. 1: Medicaid Eligibility Redeterminations (12/31/2026)	Previously redeterminations occurred once a year, now it will occur twice a year.
6.	H.R. 1: Medicaid Work Requirements – (12/31/2026)	No nationwide requirement was previously in effect until HR 1 was passed. Now Medicaid will match the work requirements of SNAP.
STATE IMPACTS		CONTRA COSTA COUNTY IMPACTS
7.	FY 25-26 State Budget Enrollment Freeze for Full-Scope Medi-Cal Expansion Undocumented, ages 19-54 (January 1, 2026)	As of January 1, 2026, undocumented adults aged 19-54 will no longer be able to enroll into Medi-Cal. Existing enrollees will maintain their coverage if they renew annually, and children and pregnant people can still enroll regardless of immigration status. Those who do not enroll by this date and do not have other eligible immigration status will have access to limited-scope coverage for emergencies and pregnancy care.
8.	FY 25-26 State Budget New Medi-Cal Premiums for Adults with Unsatisfactory Immigration Status (July 1, 2027)	Adds a new cost of \$30 month that individuals currently do not have to pay.
9.	FY 25-26 State Budget Reinstatement of Medi-Cal Asset Test Limits (January 1, 2026)	Reinstates the asset limits back to 2022 levels - \$130,000 for an individual, and an additional \$65,000 for each extra household member up to 10 members.
10.	FY 25-26 State Budget Community First Choice Option (CFCO) Late Penalties	Contra Costa County currently has overdue In-Home Supportive Services (IHSS) cases. At this point, it appears the monthly penalty for late IHSS renewals could be approximately \$300,000.