

Federal Policy Developments Digest

November 7, 2025

Judge Orders Trump Administration to Fully Fund SNAP (11.6.25)

On November 6, Federal Judge John J. McConnell Jr. <u>ordered</u> the Trump administration to fully fund the Supplemental Nutrition Assistance Program (SNAP), which the Justice Department immediately stated it would appeal. Judge McConnell's order came in response to the Trump administration's unprecedented decision to <u>halt</u> regular SNAP disbursements on November 1 rather than draw on contingency funds. On October 31, Judge McConnell and Judge Indira Talwani had ordered the government to use contingency funds to keep SNAP funded. On November 5, the U.S. Department of Agriculture <u>shared</u> in a memo that it would issue partial SNAP payments covering 65% of regular benefit amounts using contingency funds, after originally indicating it would pay only 50%. Agriculture Secretary Brooke Rollins <u>cautioned</u> that these payments could take "several weeks" to process, which led Democracy Forward to <u>file</u> an emergency request asking Judge McConnell to order the administration to expedite benefits or give additional relief. Judge McConnell's November 6 order now requires the federal government to make full SNAP payments to states by Friday, November 7, using funding for child nutrition programs and contingency funds to ensure full payments. SNAP recipients did not receive payments on the usual November 1 disbursement date, creating the first-ever lapse in SNAP benefits since the program's inception.

Implications/next steps: In FY 2024, SNAP provided support to 41.7M people, or 12.3% of the U.S. population. The US Government Accountability Office found that 3.8 million college students experienced food insecurity in 2020 and estimated 1.1 million college students may be receiving SNAP. (Underlying federal data only indicates household receipt of SNAP, making it difficult to calculate the exact number of student recipients.) Mark Huelsman at the Hope Center for Student Basic Needs at Temple University expressed concern that campus food pantries will be stretched thin and urged institutions to expand student food supports and emergency aid. The Hope Center also released a guide to help institutions assist students affected by SNAP disruptions. Alongside efforts to address students' basic needs, institutions are also facing shutdown-related interruptions to research and tuition assistance for military-affiliated students.

Department of Education Reaches Consensus on Which Programs Qualify as Professional (11.6.25)

The Department of Education and the Reimagining and Improving Student Education (RISE) committee – the negotiated rulemaking committee focused on federal student loan borrowing and repayment options – reached <u>consensus</u> on November 6 regarding which degree programs will qualify as professional and therefore be eligible for higher loan caps under OBBBA. The ED had previously <u>proposed</u> that only 10 programs would qualify as professional degrees; now, the list includes the original 10 programs, a doctorate in clinical psychology, and a handful of other doctorate programs that fall within the same four-digit CIP codes.

Implications/next steps: This professional program classification is important because under OBBBA, professional programs have a \$200K total loan cap (\$50K annually), whereas other graduate programs are capped at \$100K (\$20.5K annually). Therefore, one concern with the proposed regulation is that a limited number of programs will receive the higher loan cap. As far as next steps, the proposed regulation will now be subject to public comment. (If the ED and the RISE committee had not reached consensus, then the ED would have been able to rewrite any aspect of the proposal before releasing it for public comment.) The final rules should then be posted in early 2026 to take effect on July 1, 2026.

Department of Education Publishes Final Rule on Public Service Loan Forgiveness (10.30.25)

The Department of Education published a final <u>rule</u> in the Federal Register on Public Service Loan Forgiveness (PSLF), which states that public workers whose government or nonprofit employers engage in activities with a "substantial illegal purpose" – as determined by the education secretary – can be denied loan forgiveness. This rule will take effect on July 1, 2026. According to the rule, examples of illegal activities <u>include</u> aiding and abetting violations of federal immigration law, supporting terrorism, providing gender-affirming care. Though the ED has stated that fewer than 10 employers will be impacted by this rule change, critics worry the impacts will be more extensive. PSLF was <u>created</u> in 2007 to cancel federal loan debts of borrowers who have spent a decade working in public service. It is designed to encourage people to pursue careers in the public and nonprofit sectors.

Implications/next steps: Critics <u>argue</u> that the rule's vague language could allow Trump and future presidents to misuse executive authority by deciding which employers qualify for PSLF based on ideological alignment. In other words, PSLF could be used as a political weapon to punish opponents. The Trump administration and Republicans have stated that the rule change is focused on refocusing PSLF towards workers serving the public good. Three lawsuits have recently been <u>filed</u> in an attempt to prevent the Trump administration from implementing this new rule.