

## **FAMILY INVESTMENT ADMINISTRATION**

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|---------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Policy Number:</b>           | AT 26-08                                                                                                                                   |
| <b>Policy Title:</b>            | H.R. 1 (2025)-Treatment of Energy Assistance Payments                                                                                      |
| <b>Release Date:</b>            | October 16, 2025                                                                                                                           |
| <b>Effective Date:</b>          | November 1, 2025                                                                                                                           |
| <b>Approved By:</b>             | Augustin Ntabaganyimana<br>Executive Director<br>Family Investment Administration                                                          |
| <b>Revision Date(s):</b>        | Not applicable.                                                                                                                            |
| <b>Supersedes:</b>              | <a href="#">IM 25-15 Heat and Eat (H-EAT)</a>                                                                                              |
| <b>Originating Office:</b>      | Office of Programs<br>Office of Nutrition Assistance Programs (ONAP)                                                                       |
| <b>Required Actions:</b>        | Accurately code the shelter expenses for all SNAP households.                                                                              |
| <b>Key Words:</b>               | Standard Utility Allowance, SUA, Maryland Energy Assistance Program, MEAP, shelter expenses, Low-Income Home Energy Assistance Act, LIHEAP |
| <b>Related Federal Law</b>      | <a href="#">Pub. L. No. 119-21 § 10103; 7 CFR 273.9(d)(6)(iii)</a>                                                                         |
| <b>Related State Laws</b>       | <a href="#">Human Serv. Article § 5-506</a> , Ann. Code of Md.                                                                             |
| <b>COMAR</b>                    | COMAR <a href="#">07.03.17.38</a>                                                                                                          |
| <b>State Plan Implications?</b> | No.                                                                                                                                        |

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|  <p><b>Maryland</b><br/>Department of<br/>Human Services</p> <p><b>Department of Human Services</b><br/>25 S Charles Street<br/>Baltimore MD 21201</p> | <p align="center"><b>FAMILY INVESTMENT<br/>ADMINISTRATION (FIA) ACTION<br/>TRANSMITTAL</b></p> |
| <p><b>Control Number: 26-08</b></p>                                                                                                                                                                                                     |                                                                                                |

**TO: LOCAL DEPARTMENTS OF SOCIAL SERVICES (LDSS) DIRECTORS,  
LDSS DEPUTY/ASSISTANT DIRECTORS FOR FAMILY INVESTMENT,  
FAMILY INVESTMENT SUPERVISORS, AND ELIGIBILITY STAFF**

**FROM: AUGUSTIN NTABAGANYIMANA, EXECUTIVE DIRECTOR**



**RE: HOUSE RESOLUTION 1 of 2025 (H.R. 1 2025)-TREATMENT OF  
ENERGY ASSISTANCE PAYMENTS**

**PROGRAM AFFECTED: SUPPLEMENTAL NUTRITION ASSISTANCE  
PROGRAM (SNAP)**

**ORIGINATING OFFICE: OFFICE OF PROGRAMS**

### **Summary**

On July 4, 2025, President Donald J. Trump signed H.R. 1 (2025). Section 10103 changes how energy assistance program payments are treated when determining SNAP eligibility for households that do not include an elderly or disabled member.

## Definitions

**Disabled:** An individual who meets any of the following criteria:

- a. Receiving Supplemental Security Income (SSI),
- b. Receiving disability retirement benefits from a governmental agency because of a disability considered permanent under section 221(i) of the Social Security Act,
- c. A veteran with a disability (service or non-service related) rated by the Veterans Administration (VA) as total or paid as total by the VA under title 38 of the United States Code,
- d. A veteran, surviving spouse, or surviving child who is considered by the VA to need regular aid and attendance, or permanently housebound under title 38 of the United States Code,
- e. Receiving an annuity payment under section 2(a)(1)(iv) or (v) of the Railroad Retirement Act of 1974, or
- f. Receiving an interim assistance benefit pending receipt of SSI (including Temporary Disability Assistance Program (TDAP) Type 2 benefits) or disability related medical assistance under title XIX of the Social Security Act.

**Elderly:** An individual aged 60 years or older.

**Heat & Eat:** A type of energy assistance authorized under state law that is issued in the form of an annual \$21 payment to certain SNAP households enabling eligibility for a standard utility allowance.

**Limited Utility Allowance (LUA):** An adjusted, standard deduction amount applied when a household is responsible for more than one (1) utility that is not for heating or cooling. (A list of qualifying utilities is available in the SNAP Manual section 214.1)

**Maryland Energy Assistance Program (MEAP):** A type of assistance with home heating bills provided directly to a fuel supplier or utility company on a customer's behalf.

**Standard Utility Allowance (SUA):** A standard deduction amount applied when a household is responsible for heating or cooling expenses billed separately from their rent or mortgage.

### Policy

Section 10103 of H.R. 1 (2025) changes which households are automatically eligible for the SUA because they receive a qualifying Low-Income Home Energy Assistance Program (LIHEAP) payment known as Heat and Eat. Qualifying payments are those \$21 or greater annually under the Low-Income Home Energy Assistance Act (LIHEAA) of 1981, or other similar energy assistance programs (i.e., MEAP).

Effective 11/1/2025, households that do **not include** an elderly or disabled member and receive energy assistance **must** submit verification of their heating and cooling expenses to be eligible for the SUA.

A household that includes an **elderly or disabled member** and receives energy assistance (i.e., MEAP or Heat & Eat) will continue to automatically receive the SUA.

| Household Composition           | Energy Assistance Program Participant | Potentially Eligible for SUA | Automatic SUA Eligibility                                                           | Requirements / Notes                                             |
|---------------------------------|---------------------------------------|------------------------------|-------------------------------------------------------------------------------------|------------------------------------------------------------------|
| Elderly (60+) and/or disabled   | Yes                                   | Yes                          | ? Yes                                                                               | Automatically eligible for SUA when receiving Energy Assistance. |
| Non-Elderly and/or Non-Disabled | Yes                                   | Yes                          |  | Must first verify heating or cooling expenses to obtain SUA.     |
| Elderly (60+) and/or disabled   | No                                    | Yes                          |  | Must first verify heating or cooling expenses to obtain SUA.     |
| Non-Elderly and/or Non-Disabled | No                                    | Yes                          |  | Must first verify heating or cooling expenses to obtain SUA.     |

### Treatment of Energy Assistance Program Payments

Prior to H.R. 1 (2025), state agencies were required to make the SUA available to any household that received an energy assistance payment (or payment contributed to a vendor on their behalf) in the current month or the prior 12

months. Now H.R. 1 (2025) excludes households without an elderly or disabled member and who receive an energy assistance payment from **automatic** SUA eligibility. Households that do not have an elderly or disabled member may still qualify for the SUA based on verified energy expenses they are responsible for paying.

Households with an elderly or disabled member and who receive a qualifying energy assistance payment will continue to have the SUA automatically applied to their case.

### **Implementation Timeline**

- A. The new policy applies to SNAP applications processed on or after **November 1, 2025**.
- B. For active SNAP households, the application of the appropriate utility allowance will take place when SNAP benefits are confirmed at the household's next redetermination or during an interim change (including a Maryland Benefit Review) to shelter or utility expenses that occur on or after November 1, 2025. The policy **will not** be applied as a mass modification of all SNAP cases.
- C. SNAP households without an elderly or disabled member who are currently receiving Heat & Eat must submit verification of shelter and utility expenses at redetermination, and when they report an interim shelter deduction change.

### **Eligibility and Enrollment (E&E) System Updates**

E&E will automatically apply this policy based on the information entered in the case. There is no daily system interface with the Office of Home Energy Programs (OHEP) to confirm MEAP status.

### **Required Action**

Eligibility workers must:

1. Check the status of OHEP applications online at <https://myohepstatus.benefits.maryland.gov/>,
2. Answer all questions on the Expenses screen in E&E to reflect accurate, up-to-date information gathered from the application and interview,

3. Request verification (i.e., 1052) for shelter/utility expenses when there is no elderly or disabled member of the household, and
4. Scan/upload all verifications of shelter/utility expenses to Case Documents in E&E.

To enter shelter expenses in E&E:

On the **Expenses** screen, select the Head of Household from the **Choose Member (1)** dropdown. Click the **Shelter Expenses (2)** tab, then click the **(+) Add Shelter Expense (3)** button.

The screenshot shows the 'Expenses' screen. A yellow box labeled '1' highlights the 'Choose Member' dropdown menu, which currently shows 'Test Caseone (38) (1/1)'. Another yellow box labeled '2' highlights the 'Shelter Expenses' tab, which is selected among other tabs like 'Dependent Care Expenses', 'Medical Expense', and 'Child Support or Alimony Ex'. A third yellow box labeled '3' highlights the '+ Add Shelter Expense' button.

In the **Shelter Expenses** window, enter the **Effective Begin (1)** and **End Dates (2)** as applicable. Select the **Yes** or **No** radio buttons for each of the **Shelter Costs (3)** questions.

The screenshot shows the 'SHELTER EXPENSES' window for 'Test Caseone (38)'. A yellow box labeled '1' highlights the 'Effective Begin Date' field, which has a calendar icon. Another yellow box labeled '2' highlights the 'Effective End Date' field, also with a calendar icon. A third yellow box labeled '3' highlights the 'Shelter Costs' section, which contains three questions with radio button answers: 'Have you received Energy Assistance during the current program year?\*', 'Do you pay for heating/cooling separately from your rent?\*', and 'Do you live in subsidized housing? \*'. There is also a checkbox for 'Heat & Eat'.

Next, *enter the **Amount (1)** and select the **Verification (2)** for each expense type reported.*

| Please select your expense type: |                                     |
|----------------------------------|-------------------------------------|
| Condo Fee                        | Amount: \$0.00 Verification: Select |
| Ground/Lot Rent                  | Amount: \$0.00 Verification: Select |
| Homeowner's Insurance            | Amount: \$0.00 Verification: Select |
| Mortgage                         | Amount: \$0.00 Verification: Select |
| Rent                             | Amount: \$0.00 Verification: Select |
| Taxes                            | Amount: \$0.00 Verification: Select |

Next, *enter the **Amount (1)** and select the **Verification (2)** for each reported utility expense type. Once complete, *click the **Save & Close (3)** button.**

| Please select your Utility type: |                                       |
|----------------------------------|---------------------------------------|
| Coal                             | Amount: \$25.00 Verification: Receipt |
| Electric                         | Amount: \$0.00 Verification: Select   |
| Garbage                          | Amount: \$0.00 Verification: Select   |
| Gas                              | Amount: \$0.00 Verification: Select   |
| Kerosene                         | Amount: \$0.00 Verification: Select   |
| Oil                              | Amount: \$0.00 Verification: Select   |
| Other Utilities                  | Amount: \$0.00 Verification: Select   |
| Phone                            | Amount: \$0.00 Verification: Select   |
| Propane                          | Amount: \$50.00 Verification: Receipt |
| Sewage                           | Amount: \$0.00 Verification: Select   |
| Water                            | Amount: \$25.00 Verification: Receipt |
| Wood                             | Amount: \$0.00 Verification: Select   |

Discard Save & Close

You will be redirected to the **Expenses** screen, which will display a **summary (1)** of the customer's shelter expenses, including the **Total Amount (2)** of expenses reported. You can *click* the **pencil (3)** icon to edit the information. If there are changes to any expenses, *enter* an end date for the existing record then create a new record using the **(+) Add Shelter Expense** button. Do not use the delete (4) icon to remove shelter expenses.

The screenshot shows the 'Expenses' screen with a 'Member' dropdown set to 'Test Caseone (38) (1/1)'. Below the member selection are tabs for 'Dependent Care Expenses', 'Shelter Expenses', 'Medical Expense', and 'Child Support or Alimony Expenses'. The 'Shelter Expenses' tab is active. A '+ Add Shelter Expense' button is visible. A table displays the following data:

| Expense Type               | Effective Date       | Amount   | Actions                      |
|----------------------------|----------------------|----------|------------------------------|
| Rent, Water, Coal, Propane | 07/01/2024 - Present | \$550.00 | [Pencil] [Trash] [Clipboard] |

The **Actions** column will display a **clipboard** icon if information was provided for any of the energy-related utility types, which include: *Gas, Electric, Oil, Propane, Kerosene, Wood, and Coal*. Click the **clipboard** icon to provide additional information.

This close-up view of the 'Actions' column shows three icons: a pencil, a trash can, and a clipboard. The clipboard icon is highlighted with a yellow box, indicating it is the icon used to provide additional information for energy-related utility types.

The **Energy Utility Provider Information** window will display the **energy-related utility types (1)** based on information entered in the Shelter Expenses window. All fields on the Energy Utility Provider Information window are optional and used by OHEP to determine benefits for households that are categorically eligible. You can proceed to the next step if the details do not apply to the household.

If applicable, for each utility type, select the **Utility Provider (2)** from the dropdown menu, enter the **Name of Person on Utility Bill (3)**, and the **Utility Account Number (4)**. Once complete, click the **Save & Close (5)** button.

The screenshot shows a web form titled "ENERGY UTILITY PROVIDER INFORMATION". Below the title is a note: "This information will be used to determine energy assistance benefits for customers who are categorically eligible". The main section is titled "Please enter details for the energy services you receive". It contains two columns of input fields. The first column has "Coal" and "Propane" as labels. The second column has "Utility Provider" (with dropdown menus showing "DIRECT PAYMENT" and "LANDLORD"), "Name of Person on Utility Bill" (with "Account Holder" and "Owner" as options), and "Utility Account Number" (with "123456789" and "111111111" as examples). A yellow box highlights the entire form area, with numbered callouts: 1 points to the title bar, 2 points to the "Utility Provider" dropdown, 3 points to the "Name of Person on Utility Bill" field, 4 points to the "Utility Account Number" field, and 5 points to the "Save & Close" button at the bottom right. There is also a "Discard" button next to it.

## Resources

[FNS Policy Memo-Supplemental Nutrition Assistance Program \(SNAP\) Implementation of H.R. 1 2025 – Treatment of Energy Assistance Payments 214 Utility Allowances SEPT 2025](#)

## Inquiries

Please direct policy questions to FIA Policy by completing the [FIA Policy Information Request Form](#). Montgomery County staff may submit their policy questions via email at [fia.policy@maryland.gov](mailto:fia.policy@maryland.gov).

cc: DHS Executive Staff  
Constituent Services  
DHS Help Desk  
FIA Management Staff  
Office of Administrative Hearings

# Understanding Standard Utility Allowances (SUA)

## Background

House Resolution One (also known as H.R.1 or the Big Beautiful Bill Act) was signed into law by the President of the United States on July 4, 2025. The law introduces new requirements for the Supplemental Nutrition Assistance Program (SNAP) and eliminates funding for certain components of the program.

## Updates to Utility Allowances

We know that paying for utility or heating bills can be a big part of your monthly budget. Learn more about our energy assistance programs by visiting our Office of Home Energy Programs website at [dhs.maryland.gov/office-of-home-energy-programs/](https://dhs.maryland.gov/office-of-home-energy-programs/)

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### **Q1: What are "Standard Utility Allowances" (SUA) and why do they matter for my SNAP?**

**A:** Think of a "Standard Utility Allowance" (SUA) as a preset amount that Maryland's SNAP program assumes you pay each month. When you report and verify you are paying for utilities, we calculate your SNAP benefits; we also subtract certain expenses, and your utility costs are one of them. SUA simplifies the process by letting you use a standard amount ***instead*** of proving ***actual*** utility costs.

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### **Q2: I receive the Standard Utility Allowance. How does that affect my SNAP now?**

**A:** This is where the changes come in.

- **If your household includes an elderly or disabled member AND you receive energy assistance**, for sure, your household can still use the **Standard Utility Allowance (SUA)**. This means you don't have to show your actual utility bills; you can use a preset amount, which simplifies the SNAP eligibility process.
- **If your household does not include an elderly or disabled member**

**AND you receive energy assistance:** Good news! A **Standard Utility Allowance (SUA)** may still work for your household once you give us proof that your household is responsible for heating or cooling expenses billed separately from the rent or mortgage.

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**Q3: What does "elderly or disabled member" mean in this context?**

**A:** For SNAP purposes, "elderly" refers to someone aged 60 or older. "Disabled" generally refers to someone receiving certain disability benefits, like Social Security Disability, SSI, or other recognized disability payments. If you're unsure if someone in your household qualifies, it's always best to check with your local SNAP office.

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**Q4: Why are they making these changes?**

**A:** As a result of House Resolution One (also known as H.R.1 or the Big Beautiful Bill Act, these changes are aimed at refining how utility costs are factored into SNAP benefits. The goal is to ensure that benefits are distributed to reflect a household's actual need, particularly considering different household compositions and how they receive utility help.

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**Q5: Will my SNAP benefits go up or down because of these changes?**

**A:** It depends on your household situation:

- **If you have an elderly or disabled member and get energy assistance,** you likely won't see a negative impact, as you can still use the SUA.
  - **If you *don't* have an elderly or disabled member and get energy assistance,** your benefits *could* potentially decrease because the energy assistance payment will now be counted as income.
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**Q6: What should I do if I'm concerned about how these changes affect me?**

**A:** Contact your local Department of Social Services (SNAP office) at the number found at the top of your notice or 1-800-332-6347.

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**Q7: If I'm not receiving the Standard Utility Allowance (SUA) and think my household qualifies for the SUA, should I let someone know?**

**A:** Yes! Contact your local Department of Social Services (SNAP office) to report if your household includes an elderly or disabled member or if you receive an energy assistance payment. The local office can verify your eligibility and ensure a **Standard Utility Allowance SUA** is applied to your case.

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**Q8: When does this new policy go into effect?**

**A:** Good question! The new policy applies to SNAP **applications after November 1, 2025** and to active cases at redetermination date on or after **November 1, 2025**.

\*Note: Changes in household circumstances may be reported to your local department of social services at any time throughout the certification period.

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