



CWLA and AAICAMA Policy Update

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December 2025 Policy Update: December 17, 2025

Time: 12:00 PM Eastern

Link to December 2025 *Policy Update* presentation slides [here](#).

1. Congress Nears End-of-Year Deadlines

As of the December 2025 CWLA AAICAMA Policy Update, Congress had two working days before the winter holiday recess, and there is still one major deadline looming: the Affordable Care Act (ACA) Enhanced Premium Tax Credits (EPTCs), which expire on January 1st. Because the bill that ended the government shutdown included a partial continuing resolution (CR) through January 30th, there is no immediate appropriation funding deadline in December. The deadline is now the end of January 2026.

ACA Enhanced Premium Tax Credits

These tax credits are applied when individuals or families purchase healthcare plans through the ACA Marketplace, making premiums more affordable. They expire on December 31 without Congressional action. According to estimates from KFF and others, the cost of premiums for next year will have roughly doubled in anticipation of the expiration of the EPTCs.

There have been two hearings on the Hill about addressing healthcare costs:

- [Senate Finance hearing](#)
- [Senate HELP hearing](#)

There are currently three “plans,” in the Senate. though none of them have enough votes to pass:

- Democrats have introduced and voted on a bill to extend the EPTCs for 3 years, per the agreement to end the shutdown.
- Senator Cassidy (R-LA) and others want to put funding into health savings accounts.
- Senators Collins (R-ME) and Moreno (R-OH) have a plan that would extend them for a year, cap the full benefit at 400% of the federal poverty rate, and eliminate zero-premium plans.

In the House- it’s complicated. A healthcare package bill will be voted on that does NOT include the EPTCs. There are multiple amendments and other bills that have been introduced:

- Two by Moderate Republicans that would change eligibility.
- House Minority Leader Jeffries to extend the EPTCs for 3 years.

Speaker Johnson has stated he will not hold a vote on these amendments. But four (4) Republicans signed on to Jeffries' discharge petition to force a vote on his bill to extend the EPTCs for three years. Note: This bill is identical to the Senate Democrat bill. The four Republicans are:

- Rep. Brian Fitzpatrick (PA-01), Rep. Ryan Mackenzie (PA-07), Rep. Rob Bresnahan (PA-08), and Rep. Mike Lawler (NY-17)

It remains unclear as to when the vote will happen. Technically, according to House rules, the vote does not have to happen until Congress returns in January 2026. Rep. McGovern (D-MA) is trying to force a vote before they leave for recess, but it is a long shot.

Annual Funding Bills: Stalled

Congress included three (3) full-year funding bills in the package to reopen the government, leaving nine (9) bills to pass before January 30th. Earlier in December, the majority Appropriations Chairs (Sen. Collins and Rep. Cole) announced topline agreements. Notably, this is not a “four corners” agreement with Democrat Appropriations leaders. There are several sticking points in bills that cover human services, especially the Labor, Health and Human Services and Education bill that needs to still be worked out. This sets the stage potentially for another shutdown in January, although no one wants that to happen.

2. Focus on Child Welfare

The Ways and Means Subcommittee on Work and Welfare held a hearing on November 18th, “[Leaving the Sticky Notes Behind: Harnessing Innovation and New Technology to Help America’s Foster Youth Succeed](#),” which was largely focused on using AI and other technology to build connections and provide supports for children and youth in care. Themes:

- Communities stepping up to provide resources instead of government
- Reducing administrative burden on caseworkers
- Supporting relational permanency

Please see CWLA’s [Comments for the Record](#), which were submitted in response to the hearing.

ACF Assistant Secretary Alex Adams announced the “[A Home for Every Child](#)” initiative

In the announcement, Assistant Secretary Adams confirms that his priority at ACF will be improving child welfare outcomes, making child welfare a key focus for the federal agency. The initiative builds on his work in Idaho as its Child Welfare Director to shrink the ratio of foster children to foster homes. In Adams [op-ed](#) on the initiative, he notes two goals: increased numbers of foster/kinship parents, and fewer children entering and staying in foster care, indicating a broad/whole-systems focus on this single metric.

3. Immigration: Public Charge Rule

On November 19th, the Administration released a Notice of Proposed Rulemaking (NPRM) that would rescind the Biden-era Public Charge rule that clarified which benefits would “count against” immigrants’ green card determinations. Note: The guidance has been in use for 140 years.

- Since 1999, the guidance has only included cash benefits and institutionalization. The Administration expanded the number of benefits included in the analysis of who is likely to become a “public charge” – and, therefore, ineligible for a green card.
- Under the first Trump Administration, there was an effort to greatly expand the number of benefits included in “public charge determinations.” The “determination” analyzes the benefits received to determine if a noncitizen would likely become primarily dependent on the government for subsistence- a “public charge.”

- Impact: Increasing the number of benefits included in the determination increases the likelihood that an applicant would be considered a risk of becoming a “public charge.” Decreasing the number of benefits included in this analysis decreases the likelihood that a noncitizen would be considered at risk of becoming dependent on the government for assistance.
- The new NPRM would rescind the current rule but not replace it, promising guidance at a future date. It’s unclear exactly which benefits could be at risk of being included in the analysis, but if finalized, the rule is likely to have broad, widespread impact on immigrant communities/who is granted a green card as well as industries and service providers depended on their workforce.

Comments on the NPRM are due by December 19th. Several organizations have created helpful resources:

- [Protect Immigrant Families Toolkit](#)
- [PIF Action Toolkit](#)
- [PIF Sign-on Comment](#)
- [CTAN Sign-on comment regarding the impact on children](#) (CWLA helped draft and review this comment)

4. Other Updates

SNAP Lawsuit on Immigrant Eligibility: Democratic attorneys general from 21 states and the District of Columbia [have sued the U.S. Department of Agriculture \(USDA\)](#) over recently issued guidance implementing changes under HR1 to immigrant eligibility for SNAP. The filing comes after attorneys general sent Agriculture Secretary Brooke Rollins a [letter](#) raising the issue last week. The guidance makes some humanitarian immigrants permanently ineligible for SNAP even after they receive status, which the lawsuit claims goes beyond the intent of the HR1 restrictions. The guidance also indicates that the error rate calculation started on July 4, the day that HR1 was signed into law, rather than the date the guidance was released, as is customary because state agencies need the guidance to understand how to implement HR1 directives.

Earlier in December, the Administration [threatened to withhold SNAP administration funding](#) from Democratic leaning states that refuse to share SNAP recipient data with the Department of Homeland Security. Twenty-two (22) states and the District of Columbia (DC) previously sued over this request for information, which was first made in February. A San Francisco-based federal judge has barred the Administration from collecting the information from those states. The USDA has not yet taken action on these threats and SNAP funding has continued in Democratic states.

Administration Releases Government Management Agenda: In December, the Office of Management and Budget (OMB) released a memo detailing the [Administration's government management agenda](#). The memo and an accompanying chart provide topline information about how the Administration plans to further shrink government. Much of what is included has already been happening, though without further details, it’s hard to determine if more cuts and layoffs should be expected. The memo includes:

- Eliminating what are deemed as “woke” programs (definition?)
- Downsizing the Federal workforce
- “Accountability” for grantees and contractors
- Consolidating data systems and streamlining data collection