

CASH SOCIAL ASSISTANCE: LITHUANIAN EXPERIENCE AND REFORM IN UKRAINE

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Abstract. *The aim of this article is to analyse the reform of determining social assistance benefits in Ukraine, comparing it with Lithuania's experience. Previous studies have not examined the reform of calculating the amount of social assistance through a direct comparison of two countries Ukraine today and Lithuania's trajectory since the 1990s. Addressing this gap is particularly relevant now, as Ukraine is redesigning its incomedtested assistance during a period of institutional transformation, warrelated pressures, and heightened social vulnerability.*

The study applies a comparative research design that juxtaposes two posttransition welfare systems undergoing institutional restructuring. Lithuania represents a mature posttransition case, where incomedtested social assistance has evolved over three decades, while Ukraine constitutes a current reform case, redesigning its benefit calculation system under conditions of accelerated institutional change. This design enables the identification of structural similarities, pathdependent constraints, and recurring policy challenges in the development of incomedtested assistance.

Lithuania provides an appropriate policy lesson for Ukraine because both countries share comparable legacies of Soviet social policy, similar trajectories of welfare state formation, and reliance on incomedtested assistance as a core antipoverty instrument. Lithuania's experience with replacing the minimal subsistence level by the statesupported income and the subsequent longterm stagnation of this benchmark offers a relevant cautionary example for Ukraine as it introduces a new basic amount for benefit calculation. The Lithuanian case demonstrates how politically convenient but infrequently updated benchmarks can erode the adequacy of social assistance over time.

To achieve the aim, the study employs legal document analysis in Lithuania and Ukraine. It also uses secondary data from the Monitoring of Social Assistance Effectiveness in Lithuania and Eurostat. In addition, the analysis incorporates previous academic research and reports issued by international institutions.

The findings reveal notable similarities between Ukraine's current reform and Lithuania's reforms in the early 2000s. Lithuania's experience with the statesupported income introduced as a replacement for the mini-

mal subsistence level demonstrates that social benefits failed to ensure even the minimal subsistence threshold. The statesupported income remained largely unchanged after 2003, resulting in a persistent gap between benefit levels and actual living costs. Based on this experience, Ukraine should closely monitor the relationship between its newly introduced basic amount and the minimal subsistence level to avoid similar longterm stagnation.

This comparative analysis contributes to the broader welfare state discourse in Eastern Europe, revealing structural parallels in the evolution of social assistance policy in Lithuania and Ukraine. It also adds to wider debates on the design of incometested assistance in posttransition contexts, underscoring the importance of maintaining a realistic, regularly updated calculation base to ensure effective income support.

Policy implication: Maintaining a regularly revised and empirically grounded calculation benchmark is essential to prevent benefit erosion and ensure the longterm adequacy of incometested assistance.

Keywords: minimal income; social assistance; state-supported income; benefits; Lithuania; Ukraine

Reikšminiai žodžiai: minimalios pajamos, piniginė socialinė parama, valstybės remiamos pajamos, socialinės išmokos, Lietuva, Ukraina

Introduction

Cash social assistance constitutes the core minimum income support for individuals who lack other resources. Global and European policy documents consistently emphasise the importance of guaranteeing minimum income safety. One of the 20 principles of the European Pillar of Social Rights is the right to minimum income, and the European Pillar of Social Rights Action Plan identifies minimum income schemes as essential instruments to ensure that no one is left behind. At the international level, Article 25 of the Universal Declaration of Human Rights affirms that everyone has the right to an adequate standard of living, including access to food, housing, medical care, and necessary social services. Reflecting these commitments, the EU Council Recommendation on Adequate Minimum Income (2023) urges member states to ensure adequate minimum income benefits, complemented by accessible social services and active inclusion measures.

Recent European debates have increasingly focused on the adequacy, accessibility, and updating mechanisms of minimum income schemes, highlighting persistent gaps between benefit levels and actual living costs in many member states. These discussions are particularly relevant for posttransition welfare states, where minimum income schemes often emerged during periods of fiscal constraint and institutional restructuring. Comparative welfare state research shows that postcommunist countries continue to face challenges related to benefit adequacy, meanstesting strictness, and the political sustainability of minimum income benchmarks.

Previous studies have examined various aspects of social assistance in Lithuania and Ukraine separately. Matulionytė and Navickė (2018) analysed the strictness of social assistance conditions in Lithuania, showing that meanstesting and additional eligibility requirements significantly shape access to benefits. Gabnytė et al. (2020) explored nontakeup of cash social assistance (CSA) in the context of Lithuania's CSA system reform. Aidukaite et al. (2020) examined the inadequacy of social assistance benefits, poverty among recipients, and legislative amendments aimed at labour market reintegration. Gabnytė (2024) found that minimum benefits in both Lithuania's systems remain relatively low compared to the minimal consumption needs basket. In Ukraine, Kuppenko et al. (2025) mapped the actors and initiatives behind the ongoing social assistance reform, noting that one of its central objectives is to decouple benefit calculation from the statutory subsistence minimum.

Although these studies provide valuable insights, they reveal a clear gap: insufficient attention has been paid to reforms specifically targeting the determination of social assistance benefit amounts, especially in a comparative perspective between postcommunist countries. Existing research tends to analyse Lithu-

ania and Ukraine separately, without examining how their benefitdetermination systems have evolved, diverged, or converged over time.

To address this gap, our study examines: what are the key similarities and differences in social assistance reforms focusing on the determination of benefit amounts in Ukraine compared with Lithuania? This question emerges naturally from the identified gap and aligns with broader European debates on minimum income adequacy and welfare state transformation.

The aim of this article is therefore to analyse the reform regarding the determination of social assistance benefits in Ukraine, comparing it with Lithuania's experience. By comparing a mature posttransition case (Lithuania) with a ongoing reform case (Ukraine), the study contributes to the literature on social welfare by illuminating shared challenges and policy lessons relevant for minimum income design in postcommunist contexts.

To achieve the research aim, we first analyse previous research on social assistance, including its objectives, benefit definitions, and links to poverty alleviation; second, we examine the development of Lithuania's benefitdetermination policy since the 1990s; and finally, we analyse Ukraine's ongoing reform, focusing on changes to benefitdetermination criteria.

Social assistance aims, determination of benefits and protection against poverty

In scholarly discourse, social assistance benefits are frequently referred to as a final safety net. Eardley et al. (1996); the World Bank (2006); Adema (2006); Luttens (2010); Immervoll et al. (2015); and Charcyron and Domingues (2016) characterised social assistance as programs that ensure a minimal standard of living for individuals with inadequate incomes. Matsaganis (2000) provided a more precise definition. He asserts that social assistance benefits are allocated to people or families whose income or resources fall below a specified threshold. The World Bank (2006) defined social assistance programs that augment family or individual income according to a specified benchmark established nationally or regionally. This emergency assistance can significantly influence both the magnitude and severity of financial destitution. Immervoll et al. (2015) defined social assistance programs as public cash or in-kind transfers designed to avert extreme hardship, using a low-income criterion as the primary eligibility condition. Öktem and Leisering (2025) see social assistance as a program designed to address individuals identified as poor based on their needs.

In contrast, social assistance, as delineated by Königs (2018), seeks to implement comprehensive minimum income benefit schemes in most OECD nations, aimed at ensuring an appropriate standard of living for households and people lacking sufficient financial resources from alternative sources (Noël 2019; Berkel 2023). Minimum income protection (MIP) establishes the benefits to which an individual or household with minimal or nonexistent income sources is eligible. This ultimate source of income, typically comprising social assistance benefits and related transfers, serves as a crucial indicator of a nation's dedication to social justice. The discourse over the benefit amount and the reference basis pertains to the examination of social assistance. Matsaganis (2000) noted that the thresholds established for various social assistance services are very disparate. Pieters (2006) asserts that social assistance benefits may be fixed; however, they are typically determined by the needs and resources of the individual in question. The fixed amount will typically be determined based on the expenses considered essential for a satisfactory standard of living. The government often delineates the products and services deemed essential for a satisfactory standard of living (Pieters 2006).

According to Adema (2006), a defined minimum income level is incorporated into the social assistance payment. Adema (2006) states that in the majority of other OECD nations, governments establish benefit payment rates, which are influenced to varied extents by poverty lines, budget surveys, and external factors such as wages, replacement rates, and fiscal constraints. Öktem and Leisering (2025) stated that benefit standards fluctuate according to public budgets. They noted that benefit standards can be vague or even absent, which raises concerns about the adequacy and fairness of the support provided to those in need.

Social assistance payments are designed to address standard living expenses. In numerous OECD countries, social assistance rates were based on a basket of products and their pricing. Typically, governments adjust payment rates annually, frequently in accordance with inflation (Adema, 2006). Social assistance benefits are typically allocated at or below the poverty criterion (Nelson, 2010). Barrientos (2013) asserted that, per Rawls, the social minimum is predicated on essential necessities. Support for those in poverty via the social minimum is a fundamental purpose to guarantee that the least advantaged can engage fully in political life as equal citizens (Barrientos, 2013). The adequacy is important, because social assistance is a crucial instrument to eradicate poverty (Jørgensen, 2024). Noël (2019) posits that the concept of a social minimum delineates a baseline income protection that establishes a social protection floor for citizens, ensuring that no individual falls below this threshold; the means test component clarifies how this income serves as a final recourse for those with incomes beneath a specified level. However, governments exhibiting a higher public debt relative to GDP and an increasing debt trajectory are more inclined to permit the deterioration of social assistance income adequacy (Noël, 2019). Erdem et al. (2023) also noted that structural factors such as GDP, inequality, dependency ratios, and unemployment constrain governments. The objective of cash aid is to guarantee a minimal level of living for the population (Bitinas et al. 2020). Social protection floors are officially established frameworks of fundamental social security assurances designed to avoid or mitigate poverty (Ncube and Murray 2024). Social assistance, or social safety net programs, are non-contributory payments typically aimed at vulnerable populations. Certain programmes concentrate on alleviating chronic poverty (World Bank. n.d. *Social Assistance / Social Safety Nets*). The poverty line in the majority of countries surpasses the monetary amount provided by social assistance benefits. The minimum, often set within social insurance programs, is typically more than the benefits provided by social assistance (Pieters, 2006). According to Nelson (2010), regardless of the generosity of programs concerning qualifying criteria and exempt incomes, benefits must exceed the poverty line to effectively alleviate poverty. If financial support is insufficient, focus shifts from resolving fundamental socioeconomic issues to merely fulfilling basic necessities (Adema, 2006). Brooks (2015) articulated that the primary policy objective remains consistent: to disrupt the intergenerational perpetuation of poverty (Ilmakunnas, 2023) by sustained human capital investment, while simultaneously delivering monetary assistance to address the immediate needs of the most vulnerable populations. Minas et al. (2018) assert that the social protection systems of countries can be conceptualised as multi-tiered safety nets, with variations among nations regarding the number of levels and their governance structures. Social assistance occupies a peripheral role within the broader framework of social security (Matsaganis 2000). The execution of solidarity under minimal rights-based frameworks is contingent upon the specific economy in question, namely the aggregate income available (Luttens 2010). Consequently, as noted by Balvociute (2020), social assistance expenditures for low-income individuals are significantly lower in Central and Eastern European nations than in Western countries. However, Swedish social assistance has decreased in generosity over a period of 25 years as well (Bergmark and Stranz, 2025), and Nordling and Persdotter (2021) found that in Malmö (Sweden), it was a restrictive approach for irregularised migrants.

Rose's (1991) lesson-drawing theory provides a conceptual lens for analysing the mechanisms of similarity of politics between Lithuania and Ukraine in the domain of social assistance calculation. Rose (1991) emphasizes that policymakers do not copy policies wholesale; instead, they select, adapt elements that fit their own political, administrative, and institutional context. Therefore lesson-drawing is a bounded and selective learning process, shaped by political incentives, problem definitions, and implementation capacity. Rose (1991) highlights common risks: ignoring contextual differences, transferring only fragments of a policy, or adopting lessons for symbolic rather than substantive reasons.

Data and Methods

To achieve the aim of the study, a qualitative content analysis of Lithuanian and Ukrainian legal documents regulating social assistance was conducted. Legal texts were examined using predefined analytical

categories – eligibility rules, benefit calculation mechanisms, and administrative arrangements – which were refined inductively as additional patterns emerged from the material. Lithuania and Ukraine were chosen as comparative cases because both have undergone substantial reforms of income-tested social assistance, share comparable reform trajectories despite different welfare state development stages, and provide publicly accessible legislation and statistical data. The comparison was carried out through a structured thematic approach, assessing each country against identical analytical dimensions and tracing reform sequences over time to identify converging or diverging policy logics. Lithuanian analysis covered changes in the three core laws governing the state-supported income (SSI) from 1990 to the introduction of the minimum consumption needs level in 2018, while the Ukrainian case focused on Cabinet of Ministers Resolution No. 766 (23 June 2025), which launched pilot projects aimed at centralising and restructuring social assistance payments. Outdated documents were excluded to ensure analytical precision. Secondary quantitative data (2003–2025) from Lithuania's Monitoring of Social Assistance Effectiveness and Eurostat were used to evaluate benefit adequacy, coverage, and poverty reduction, complemented by a review of previous studies explaining the evolution of both countries' social assistance systems. The study's limitations include reliance on formal legal provisions rather than implementation practices, ongoing reforms in Ukraine that may affect system stability, differences in institutional environments that complicate direct comparison, and uneven data availability across countries.

Development of policy determining the amount of the benefit in Lithuania

After 1990, Lithuania undertook the development of a new social protection system, as the Soviet-era structure, which was based on state employment, no longer suited the conditions of a market economy. There was a need to establish a clear criterion to determine eligibility for various forms of support, including social assistance, compensation for heating, water, and housing costs, as well as certain child benefits.

The Law on Individual Income Security (LRS 1990) stipulated that the amount of social assistance depends on the social assistance norm (r) and the extent to which a family's income falls below the minimum standard of living (MSL). The social assistance norm is equal to the ratio between the income guarantee (G), which is paid to a family with no income, and the minimum standard of living: $r = G / \text{MSL}$.

The government determines the level of supported income eligible for social assistance, the social assistance norms, and the amount of the income guarantee. The amount of the income guarantee cannot be lower than the portion of the indexed minimum standard of living allocated to food expenses (based on food prepared at home).

In its 1992 Lithuanian country economic report, the World Bank recommended that Lithuania introduce a clearly defined minimum poverty line. The World Bank (1992) criticised the currently existing minimum level of living, saying it reflects average consumption, is based on an average family structure, and is linked to the average price index. A genuine poverty line could be based on the cost of a special basket of basic necessities or defined as a lump-sum subsistence minimum. In either case, it should be minimal but ensure adequate nutrition, health, warmth, and similar basic needs; (b) be adjusted for family size; and differentiate between regions. Based on the definition of the poverty line, a general system of basic social assistance can be designed to provide benefits that raise the recipients' income to the level of the poverty line.

At the end of 1994, the Law on Individual Income Security was substantially changed. State-supported income (hereinafter SSI) was introduced instead of MSL for social assistance benefit calculation. The social assistance benefit rate (r) since the beginning of 1995 has been increased from 0.4 to 0.9. However, in real terms, because of rather high inflation, it did not mean an increase of the support (Lazutka, Poviliūnas, 2009, p. 6). The main strands of the safety net were set in 1994 when the Government of Lithuania approved the Conception of Social Assistance (LRV 1994).

In the 2002 World Bank Report No. 25005-LT, it was defined that the *applied MSL* is substantially

lower than the *calculated MSL* and is adopted, taking into consideration the capacity of state budgetary resources. According to the Law on Individual Income Security, SSI is defined as a level of income guarantee not lower than the money spent on *food* as determined in the MSL. It is also approved quarterly, and the level has been between the calculated MSL and the applied MSL. The SSI is the benchmark used to determine whether a household or an individual is eligible for any income-tested benefits.

The value of MSL and SSI measured in constant prices has been more or less stagnant, with a slight decline recently. As a percentage of average net wage, MSL and SSI have both gradually declined over time. The current social assistance programmes have significant inclusion and exclusion errors and do not effectively assist the poor. The government could consider increasing the income-testing threshold so that it reflects more closely the true minimal subsistence level and indexing it fully to inflation (Report No. 25005-LT 2002).

In 2003, the government implemented significant changes in the area of minimum income. In 2003, social protection developed under the influence of three significant factors. First, it was the final year of preparation for joining the European Union. Second, Lithuania's economy was growing rapidly, unemployment continued to decline, and the financial situation of both the state and social protection institutions improved. Finally, it is important to note that since 2001, the country has had a stable government, and there have been no changes in the ruling majority in the Seimas (SADM 2003).

After the *Law on Financial Social Assistance to Low-Income Families (Single Persons)* came into force, Lithuania introduced a unified system of financial social assistance that takes into account both family income and assets. The law, originally adopted in 2003 (LRS 2003) and later amended in 2006 under the new title *Law on Financial Social Assistance to Low-Income Families and Single Persons* (LRS, 2006), replaced the main non-contributory, means-tested provisions on the subsistence minimum that had previously been established in the earlier *Law on Individual Income Security* (Lazutka and Poviliūnas, 2006).

According to the law, "State-supported income is the income level used to assess eligibility for financial social assistance, which is approved by the Government of the Republic of Lithuania" (SADM, 2003). The legal rationale is explicitly stated: To unify the income level, the SSI level established by the government, rather than the MSL, is used to determine eligibility for monetary social assistance and housing heating compensation for low-income families (or individuals living alone) (SADM, 2003).

It means that in 2004, a unified system of monetary social assistance provided on the basis of income and asset assessment was created. However, it was emphasised that SSI is not directly linked to living standards. It is a social policy tool through which the state defines the threshold for assistance. "This mechanism balances the targeting of social support with the state's financial capacity" (SADM, 2003). Thus, since 2004 in Lithuania, social assistance is calculated based on the level of SSI.

Prior to Lithuania's accession to the European Union, the European Commission (2003) highlighted in the *Joint Inclusion Memorandum* that the country's social assistance system relied on the SSI, which at the time was below the poverty risk threshold. The memorandum emphasised that, to ensure social inclusion, the SSI level should be gradually increased and its application improved. Furthermore, the European Commission encouraged Lithuania to establish a clear link between the SSI and the MSL to guarantee adequate social protection. This perspective aligns with the *ILO (2012) Social Protection Floors Recommendation No. 202*, which states that countries may set minimum income thresholds according to national conditions, but these must respect human dignity and be regularly adjusted in line with living costs.

However, in 2011, the State Audit Office (2011) reported that Lithuania lacked officially approved methodologies for calculating the annual MSL or for determining the SSI. Legislation does not establish an obligation to periodically review or adjust the SSI in accordance with changes in the calculated MSL (State Audit Office, 2011). The report states that there are no legal acts regulating the calculation of funds necessary to meet minimum needs or the determination of the SSI level, and there is no clear connection between the calculated MSL and the SSI.

As shown in Figure 1, the application of the SSI level in calculating social assistance, as Lithuania's experience indicates, was a measure more suitable in terms of the state's financial capacity than actually appropriate for ensuring minimum income for the country's residents (Lazutka and Poviliūnas, 2006; Aidukaite et al., 2020).

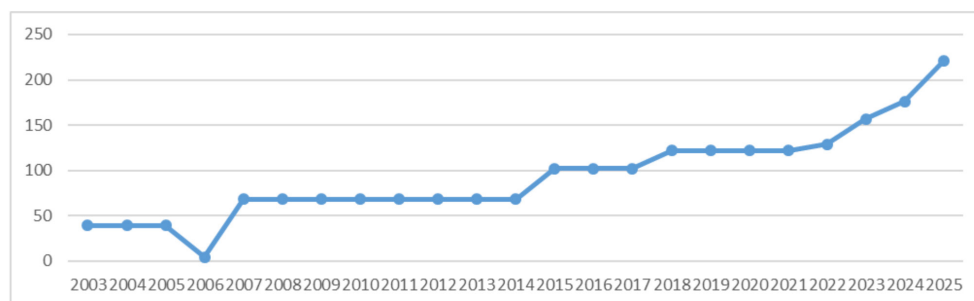


Figure 1. State supported income dynamics in Lithuania in 2003–2025 (euro).

Source: Guide to Legal Acts

The dynamics of SSI revealed periods of stagnation. If the amount of SSI is reviewed by the government, it is dependent on the government's will, budget constraints, and, in general, the attitude toward recipients of social assistance benefits.

Žalimienė, Skučienė, and Stankūnienė (2010) indicate that SSI is not sufficient to ensure even a minimal standard of living and that its application is often more of a fiscal than a social policy instrument. Lazutka (2012) notes that the level of SSI in Lithuania was determined administratively for a long time and did not reach the actual poverty threshold, resulting in recipients' incomes remaining below the MSL.

In general, the SSI was not intended as guaranteed income for all, but rather as a measure defining the threshold for social assistance. As a result, the SSI became a practical tool for implementing social policy, although in practice it was often set below the actual poverty level.

Until 2018, the calculation of the cash social assistance benefit's SSI level was not based on any objective criteria and either remained unchanged or was increased on an ad hoc basis. (Minimum Income Study, 2022, p. 15).

Since 2018 in Lithuania, the Minimum Consumption Needs Indicator (MCNI) has been introduced. This indicator represents the amount of money in euros required per month to meet an individual's minimum food and non-food (goods and services) needs. It is used to determine the amounts of the basic social benefit, the base for social assistance pensions, the base for targeted compensations, and the level of state-supported income.

The MCNI was introduced as a basis for indexation; however, it is worth noting that the indexing basis of the MCNI itself – the price index – does not meet the previously mentioned minimum income adequacy criterion (the concept of relative poverty). (Minimum income study 2022, p. 10).

The periods of stagnation in SSI amounts indicate that the income of social benefits recipients is lagging behind the country's subsistence level (see Figure 2).

Because of that, the eligibility and determination criteria of social assistance benefits were changed (instead of 1 SSI, 1.1 SSI and 1.4 SSI were introduced), which affected the amount of social benefits even without a change in the SSI itself (Minimum income study 2022). The amount of state-supported income was significantly lower than the minimal subsistence level in Lithuania and even more at risk of the poverty threshold in a country (see Figure 3).

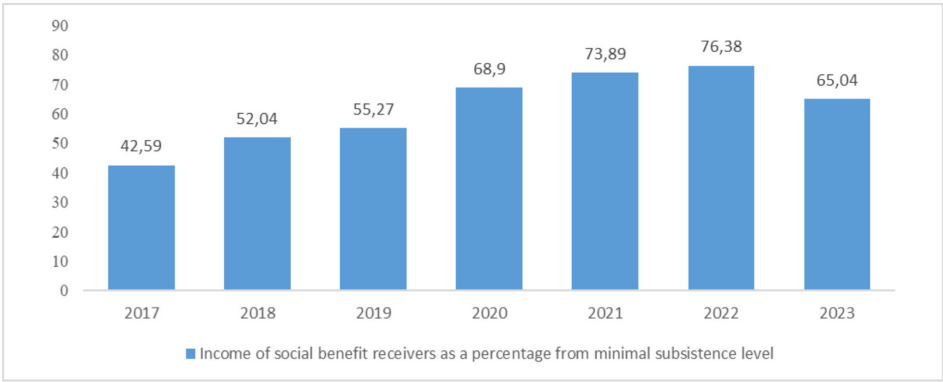


Figure 2. Income of social benefit receivers as a percentage from minimal subsistence level in Lithuania
Source: MSSL Monitoring the Effectiveness of Social Assistance in Lithuanian Municipalities, 2025

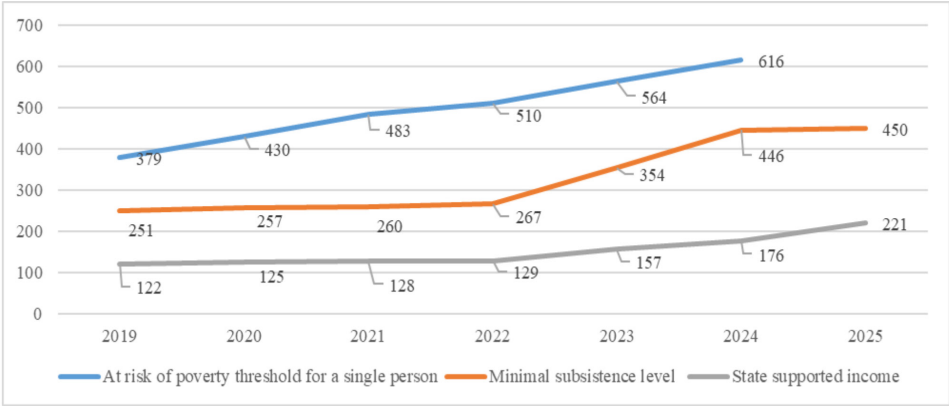


Figure 3. At risk of poverty threshold for a single person, minimal subsistence level and State supported income dynamics in Lithuania in 2019-2025
Source: At risk of poverty threshold (Eurostat); MCNI (Guide to Legal Acts); SSI (Guide to Legal Acts)

Figure 3 illustrates the evolution of key poverty and welfare benchmarks in Lithuania from 2019 to 2025: the at-risk-of-poverty threshold, the MCNI and the SSI. Over this period, Lithuania experienced a steady increase in the at-risk-of-poverty threshold from €379 in 2019 to €616 in 2024 – reflecting a general rise in median incomes and living expenses. However, despite nominal growth, the gap between this threshold and the MCNI remains substantial. While the MCNI nearly doubled, rising from €251 in 2019 to €450 in 2025, it still covers only about three-quarters of the poverty line, suggesting persistent inadequacy in meeting essential needs. The SSI (used to calculate social benefits) shows a slower but notable rise from €122 in 2019 to €221 in 2025, indicating gradual policy adjustments to social assistance schemes. Nevertheless, its value remains well below both the MCNI and the poverty threshold, highlighting continuing challenges in ensuring social protection adequacy.

Overall, the data reveal that although Lithuania has made progress in increasing support levels, welfare indicators remain insufficient to close the gap between the lowest-income groups and the national poverty line.

The analysis of Lithuania’s social assistance model enables a clearer understanding of the mechanisms and outcomes associated with SSI. To further explore these dynamics, the following section examines

Ukraine's social assistance system, selected for its ongoing reforms of criteria for benefit determination and contrasting institutional environments.

Social assistance reform in Ukraine

After 1991, Ukraine had to reform its social security system to make it compatible with a market economy (Libanova et al., 2009). Combinations of social insurance and non-contributory social benefits have been implemented: a pension scheme (social insurance), social benefits (income-based), and housing compensation (Libanova et al., 2009).

Over the last decades, social reforms in Ukraine have been periodically taking place, depending on the political situation, the fiscal situation, and interventions from international institutions (e.g., demands for austerity from the IMF, reorientations) (Farbar and Rowley, 2023).

2006-2010 Social Assistance System Modernisation Project with support from the World Bank defined objective: integrate social benefit data, simplify applications and improve targeting. Most social assistance resources go to people who are entitled to benefits, not necessarily because they are poor. Benefits are not reaching the people who really need them.

Benefits started to be calculated on the basis of the subsistence minimum – the minimum standard of living set by the state (World Bank, 2011).

If the average family income (per person) does not exceed the minimum subsistence level, the family receives an allowance calculated as the difference between the minimum subsistence level and the average family income.

For an extended period, the subsistence minimum in Ukraine served simultaneously as a normative threshold (defining entitlement to social guarantees) and as a fiscal-administrative benchmark (an anchor for various budgetary measures). This dual role produced a conflict of functions that hindered the indicator's primary purpose – ensuring an adequate minimum for basic living needs. Because the threshold also operated as a “budgetary lever”, it was repeatedly subject to political and fiscal compromises; as a result, its level frequently failed to reflect the real expenditures of households striving to meet basic consumption needs. This incompatibility of roles creates a structural condition for the systemic inadequacy of targeted transfers and undermines public trust in social protection mechanisms.

From the perspective of minimum income and social protection, an indicator that aspires to serve as a social standard should: (1) reflect a consumption basket that guarantees basic needs (food, housing, heating, healthcare, etc.); (2) be based on a transparent, publicly available calculation method; and (3) be linked to an indexing mechanism that adjusts it for changes in prices, consumption patterns and regional differences (Adema 2006; Figari 2011; Nelson, Kenneth and Fritzell 2014; Noël 2019). If any of these elements is missing, the indicator loses legitimacy as a social standard and becomes an administrative benchmark suitable for budgetary compromise but not for guaranteeing a minimum income.

Ukraine's social assistance provides cash benefits:

- For people capable of working: 45% of the subsistence minimum;
- For children: 130% of the subsistence minimum;
- For individuals with disabilities and those who have lost their ability to work: 100% of the subsistence minimum.

The maximum benefit amount is 100% of the subsistence level for a family.

The social assistance programme has virtually no impact on poverty and inequality in the country: if payments to low-income families were cancelled, the poverty rate would increase from 43.2% to 43.3%, and the Gini coefficient would increase from 24.9% to 25.0% (Cherenko, 2021).

The Russian invasion in 2022, with its millions of displaced people, war veterans, and income losses, has increased the need for a unified and automated support system.

A discussion has started over a single fixed base amount to replace several old criteria in Ukraine. International partners (World Bank, UNDP, UNICEF) recommend a single formula with automatic income assessment.

War conditions (from the 2014 conflict in the East, then the 2022 wider invasion) are putting severe pressure on the national budget, increasing pressure to consolidate various benefits, cut red tape and improve targeting.

Ukrainian policymakers and international financial institutions have expressed concern about the extent of state spending on social assistance, claiming a pressing financial need to switch to a much leaner model of state support for vulnerable people. The ministry contends that the current administration of social benefits is inefficient, and the system is opaque and complex, necessitating a new framework. These reforms, however, are coming at a time when millions of Ukrainians face displacement, job losses, and rising prices in a war-ravaged economy. In 2023 March, the prime minister, Denys Shmyhal, outlined the main changes that await Ukrainians, promising “a new social contract between the state and citizens” as part of the government’s action plan for 2023. This involves ‘strengthening control’ of social benefits by digitalisation, reviewing the state’s financial obligations with a view to reducing their number, checking if a citizen really requires state assistance and providing people with social services (rather than funds) to help them ‘overcome their difficult circumstances’ and become economically independent again. The government plans to enhance the targeting of social payments, improve recipient databases, and increase payments after assessing individual needs. It also plans to introduce guaranteed basic social assistance, which will be means-tested and aimed at the most vulnerable sections of the population (Semchuk and Rowley, 2023).

The experimental model of “basic social assistance” was launched, formulated through the Cabinet of Ministers’ Resolution № 371 (25 March 2025) as a new integrated benefit mechanism with a single “basic amount” as the unit of calculation (Pension Fund of Ukraine, 2023).

The experimental model in Ukraine sets the basic amount at UAH 4,500. The first family member is paid 100% of the basic amount and each additional family member 70% of the basic amount. Children up to 18 years of age and persons with disabilities in group I or II are entitled to 100% of the basic amount. For pensioners who do not have enough “social insurance experience” to earn a full pension, percentages are applied depending on how many years of insurance experience they have (e.g., less than 10 years – 53%, between 10 and 20 years – 62%).

The housing rental subsidy is no longer included in the average monthly total income of the family. Alimony is now included in the income calculation. The financial support for military personnel will be considered after deducting the military tax. It is also noted that assistance, material aid for addressing social and household issues, and financial assistance according to the Law of Ukraine “On State Service” are calculated by dividing the amount by 12 months, provided there is confirmation from the employer about the one-time nature of such payments.

For a family, the family’s total sum of base amounts is calculated: the total sum of base amounts assigned to each member. The family’s average monthly income is subtracted from the total of the basic amounts: $\text{Support} = \text{Total amount of the basic amounts} - \text{Mean family income}$. If the average income exceeds the basic amount, the family is unlikely to receive support (or will receive a very low or zero amount). Support is granted to the family’s authorised representative for six months. Thereafter, it is automatically renewed if the family is still eligible; introduces a single basic social assistance instead of several types (low-income, single mothers, large families, disabled people, etc.); the amount will depend on the family’s income but may not be less than the minimum subsistence level. The concept of “cost of living” is abolished; a “basic amount” is introduced, set annually by the Cabinet of Ministers. The government may review and amend the basic amount for calculating the social benefit through appropriate measures.

Initially, the project was limited to families already receiving certain social benefits (e.g., support for needy families, support for single mothers, support for large families). From 1 October 2025, more categories of persons are planned to be included in the criteria for confirmation of their need for assistance.

Before the model was launched, beneficiaries had the choice of continuing to receive the old benefits or switching to basic social assistance.

The model is gradually being extended to cover wider populations with the same criteria and to enable automatic calculation (UNDP, 2025).

Despite the structural significance of the pilot reform, several challenges raise concerns about its longterm effectiveness.

1. Absence of a transparent formula. The methodology for calculating the basic amount is not public and does not account for inflation, regional price differences, or household expenditure structures. This contradicts EU recommendations (2023), which require transparent justification of minimum income standards.
2. Risk of fixation without indexation. Lithuania's experience shows that the absence of regular revisions to social support income after 2003 led to a loss of adequacy. Ukraine currently lacks a statutory mechanism for annual indexation of the basic amount.
3. Lack of adequacy indicators. No public instrument exists to assess whether assistance meets basic needs, preventing civic oversight and participation in shaping social policy.
4. Institutional capacity of communities. Local communities responsible for registration and case management often lack digital tools, qualified staff, and resources. This creates territorial disparities in access to assistance.

These constraints show that the pilot reform is not only a technical adjustment but also a test of the state's institutional capacity. Its legitimacy as part of a "renewed social contract" will depend on embedding transparent rules, statutory indexation, and adequacy monitoring into the system. Only under such safeguards can basic social assistance become a genuine guarantee of minimum living standards and rebuild citizens' trust in the state.

Discussion

We aimed to analyse the reform of the criteria for determining the amount of the social assistance benefit in Ukraine in comparison with Lithuania's experience. Our findings show that Lithuania reformed its social assistance system by shifting the basis for calculating social assistance benefits from the minimal living standard to the statesupported income (SSI). This change introduced a new element into the benefit formula, making the level of SSI dependent on government decisions. Long periods of stagnation in SSI demonstrate its political neglect, resulting in benefit levels that remained below both the poverty threshold and the minimum subsistence level. Although SSI has increased in recent years, the gap between SSI and the minimum subsistence level remains substantial, meaning that social assistance benefits still do not ensure minimal consumption needs in Lithuania. This outcome contradicts widely accepted understandings of social assistance found in the work of Eardley et al. (1996), the World Bank (2006), Adema (2006), Pieters (2006), Luttens (2010), Barrientos (2013), Immervoll et al. (2015), and Königs (2018). The suspension of SSI increases in 2003 effectively created what can be described as "political poverty," as benefit adequacy became constrained by discretionary governmental decisions rather than objective measures of need.

Ukraine has begun reforming its social assistance system by introducing a basic amount instead of the minimal subsistence level as the basis for calculating benefit levels. Similar to Lithuania, the basic amount will be adjusted by the Cabinet of Ministers. Rose's (1991) lesson-drawing theory conceptualizes policy learning as a reasoned argument that what works in one jurisdiction may work in another, provided that policymakers selectively adapt elements that fit their own institutional and administrative context. From Lithuania's experience, the key lesson for Ukraine is that the basic amount must guarantee minimal consumption and income; otherwise, benefit adequacy risks becoming politically constrained. Rose (1991) also warns that lesson drawing is a bounded and selective process, shaped by political incentives and

implementation capacity, and that policymakers may overlook contextual differences or adopt only fragments of a policy. Therefore, Ukraine must continuously monitor the relationship between the new basic amount and the minimal subsistence level and ensure regular adjustments. Doing so would allow Ukraine to draw substantively on Lithuania's experience while avoiding the risks associated with incomplete or misaligned policy transfer.

Conclusion

Lithuania's experience demonstrates that replacing a needs-based reference with a politically determined calculation base creates long-term risks for benefit adequacy if clear safeguards are not embedded in the reform design. The findings highlight that without systematic adjustment mechanisms and a clear linkage to minimum consumption needs, social assistance benefits may gradually lose their protective function.

Limitations and further research

The analysis has several limitations that should be acknowledged. First, the study relies primarily on legal documents and secondary statistical data, which capture the formal design of social assistance systems but not the actual implementation practices or administrative discretion that may shape benefit outcomes. Second, Ukraine's reform process is ongoing, meaning that the basic amount and its relationship to the minimum subsistence level may evolve in ways not yet observable, limiting the ability to assess longterm effects. Third, differences in institutional capacity, political incentives, and administrative structures between Lithuania and Ukraine constrain the comparability of the two cases. Fourth, the study does not incorporate qualitative insights from policymakers or administrators, which could illuminate how political decisions – such as Lithuania's suspension of SSI increases – were justified or contested. Finally, the analysis focuses on benefit adequacy and calculation criteria, leaving broader social assistance functions, such as activation measures or complementary services, outside the scope.

Future research should deepen the analysis of social assistance reforms by examining how legal provisions translate into implementation practices, including administrative discretion, frontline decision-making, and regional variation in benefit delivery. Comparative work could also incorporate additional posttransition countries to assess whether Lithuania's and Ukraine's reform trajectories reflect broader patterns of welfare recalibration in Central and Eastern Europe. Longitudinal studies are needed to evaluate how Ukraine's newly introduced basic amount evolves over time and whether it maintains a stable relationship with the minimum subsistence level.

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Data Availability Statement

The data used to support the findings of this research are available from the corresponding authors upon request.

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PINIGINĖ SOCIALINĖ PARAMA: LIETUVOS PATIRTIS IR REFORMA UKRAINOJE

Anotacija. Tyrimas siekia išanalizuoti socialinės paramos dydžio nustatymo kriterijų reformą Ukrainoje, lyginant ją su Lietuvos patirtimi. Ankstesni tyrimai nenagrinėjo socialinės paramos dydžio nustatymo pagrindų lyginant dvi šalis: dabartinę Ukrainą ir Lietuvos patirtį nuo 1990-ųjų. Ši tyrimų spraga ypač aktuali šiandien, kai Ukraina iš naujo kuria pajamų testavimu grindžiamą socialinės paramos sistemą.

Tyrimo tikslui įgyvendinti taikoma Lietuvos ir Ukrainos teisinių dokumentų analizė. Naudojama antrinė duomenų analizė iš Socialinės paramos efektyvumo stebėsenos Lietuvoje ir Eurostat duomenys. Taip pat atliekama ankstesnių tyrimų ir tarptautinių organizacijų ataskaitų metaanalizė.

Rezultatai atskleidė Ukrainos reformos panašumą į Lietuvos pokyčius ankstyvaisiais 2000-aisiais. Lietuvos patirtis, kai minimalų pragyvenimo lygį pakeitė valstybės remiamos pajamos, parodė, kad socialinės išmokos negalėjo užtikrinti minimalaus pragyvenimo lygio šalyje. Taip nutiko todėl, kad valstybės remiamų pajamų dydis po 2003 m. ilgą laiką nebuvo didinamas. Todėl Ukraina turėtų nuolat stebėti ryšį tarp naujojo bazinio dydžio ir minimalaus pragyvenimo lygio ateityje.

Šis lyginamasis tyrimas prisideda prie Rytų Europos gerovės valstybės diskurso, atskleisdamas socialinės paramos politikos raidos panašumus Lietuvoje ir Ukrainoje. Tyrimas taip pat prisideda prie platesnių diskusijų apie socialinės paramos dizainą post-tranziciniuose kontekstuose ir pabrėžia būtinybę išlaikyti aktualų ir reguliariai atnaujinamą skaičiavimo pagrindą, kad būtų užtikrinta veiksminga pajamų apsauga.

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