



Analysis of Supplemental Nutrition Assistance Program (SNAP) Cuts and the Harm to Illinois

Updated May 27, 2025 (Analysis Subject to Change)

The House's passed [budget reconciliation package](#) would severely cut SNAP and harm millions of households – including 16.2% of IL residents. Read the Greater Chicago Food Depository's May 22, 2025 statement on the harmful cuts to SNAP and Medicaid passed in the House budget reconciliation package markup [here](#).

Questions or comments, contact Danielle Perry, dperry@gcfd.org, or Beth Kenefick, ekenefick@gcfd.org.

1. Increases State Cost Requirement to Unprecedented Levels

Section	What it would do	Illinois impact
10006	<p>Starting FY2028, all states would be required to pay at least 5% of SNAP benefits.</p> <p>Aiming to “incentivize” improving error rates, it then would increase the cost requirement:</p> <ul style="list-style-type: none">• If a state has a payment error rate of between 6 and 8% the state cost requirement increases to 15%.• Between 8 and 10% it increases to 20%.• If the error rate is 10% or higher, the state share is 25%. <p><i>See Appendix A for more information about this requirement and additional proposals to worsen accuracy of the error rate system.</i></p>	<p>If a 5% state cost requirement were in place now in Illinois, it would cost the state \$222 million/year.¹</p> <p>In FY23 IL had an error rate of 9.91%.² If IL needed to provide 20% of SNAP benefits, it would cost \$888 million/year.³</p> <p>If Illinois must cover a share of benefit costs, they would likely be forced to cut benefits, eligibility, or both to reduce costs.</p>
10007	<p>Starting immediately upon passage, states would be responsible for 75% of administrative costs (versus 50%).</p>	<p>Estimates suggest this <i>could</i> cost Illinois approximately an additional \$83 million/year⁴ if total administrative costs remained the same (based on FY2023 state share).</p>



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2. Cuts SNAP By Preventing Future Updates to Benefit Amount

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10001	<p>In the 2018 Farm Bill, Congress directed USDA to re-evaluate the underlying food costs used for SNAP benefit amounts (the “Thrifty Food Plan”). As a result, in 2021 USDA updated the Thrifty Food Plan for the first time in 50 years. SNAP benefits are now based on scientific nutrition standards, modern food prep, and food costs. SNAP increased an average of \$1.40/person/day.⁵</p> <p>The proposal prohibits USDA from making future increases to the cost of the Thrifty Food Plan - essentially freezing SNAP benefit amounts outside of a cost-of-living adjustment, without regard for future changes to nutrition standards, food purchasing patterns, or systemic changes in food costs.</p>	<p>SNAP benefit amounts are still too low. Across IL, on average the cost of a meal is 17% higher than the SNAP benefit per meal (\$2.84), with 26 of our state’s 102 counties over 20% higher.⁶</p> <p>Freezing the Thrifty Food Plan (TFP) will, over time, lead to SNAP benefits that become more and more inadequate and out of step with modern life for low-income Illinois families.</p> <p>This freeze will result in reductions to SNAP benefits for every IL SNAP household in the future of which currently, 1.9 million residents⁷ rely on SNAP in Illinois (16.2% of the population in 2023⁸).</p> <p>It will also result in a future cut to other benefits tied to TFP adjustments, including Summer EBT and the Emergency Food Assistance Program (TEFAP).</p>

3. Bars SNAP Benefits for Many Legally Present Immigrants

Section	What it would do	Illinois impact
10012	<p>The original House Agriculture Committee proposal⁹ barred all legally present “qualified” immigrants who are not Lawful Permanent Residents (LPRs) from receiving SNAP. This included low-income legally present</p>	<p>The <u>version that passed</u> would continue to primarily harm immigrants granted legal status on the basis of a well-founded fear of persecution and/or</p>



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	<p>immigrants who have long qualified for SNAP under the 1996 Personal Responsibility and Work Opportunity Act (P.L. 194-103) – such as immigrants granted asylum, refugee status, withholding of deportation, Cuban and Haitian entrants, humanitarian parolees, and conditional entrants. The final version of the bill that passed changed it to allow certain groups like Cubans admitted under a family reunification parole program and people present in the U.S. in accordance with a Compact of Free Association (aka “COFA migrants”) to receive SNAP.</p> <p>Note: Federal SNAP law already imposes a 5-year waiting period on many LPRs, parolees, and battered/VAWA immigrants - except for LPR children and severely disabled LPR adults (2002 Farm Bill, P.L. 107-171). Undocumented immigrants, Temporary Protected Status, victims of violence (U visas), Deferred action and others have <i>never</i> been SNAP eligible.</p>	<p>fleeing war torn countries, including refugees.</p> <p>Recent USDA data does not break down SNAP receipts by immigrant type to be able to fully estimate the impact of what changed. What we know is there are 11,000 legally present refugees in Illinois on SNAP in addition to a portion of the 52,000 “other non-citizens”.¹⁰</p>

4. Vastly Expands Failed Work Requirements (Time-Limited SNAP Benefits)

Section	What it would do	Illinois impact
10002	<p>Expands existing harsh and ineffective 3-month time limit to include:</p> <ul style="list-style-type: none">• parents or grandparents of children 7 or older, unless caring for the child	<p>Would put about 472,000 IL residents¹¹ – including older adults and children – at risk of losing <i>some or all</i> of their household’s SNAP benefits. This represents about 25% of the Illinois SNAP caseload.¹²</p>



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	<p>while both married to and living with an adult meeting the work rules.</p> <ul style="list-style-type: none">older adults until they turn 65. <p>Adults subject to the time limit requirements would only be able to receive food benefits for <i>three months in a three-year period</i> unless they show compliance with a 20-hour-per-week work requirement or prove they qualify for an exemption such as having a disability.</p> <p>Current law excludes all families with children under 18 and people older than 55 from the time limit. Congress expanded the time limit to include adults ages 50-54 in the Fiscal Responsibility Act of 2023, and added new exemptions for adults who are homeless, veterans, or under 24 and were in foster care when they turned 18. Congress sunset the expanded age range and new exemptions on October 1, 2030.</p> <p>The proposed language would make the age and parent/grandparent expansions permanent. It would not make the FRA's three exemptions permanent — those would still sunset on October 1, 2030.</p> <p><i>See Appendix B for more information on the ineffectiveness of work requirements.</i></p>	<p>This breaks down to:</p> <ul style="list-style-type: none">75,000 people in Illinois in households with adults ages 55 to 64 with no children, no disability397,000 people in Illinois in households with adults ages 18 to 64 with school-age children, no disability <p>Meanwhile, 229,000 IL residents are at risk of losing their entire SNAP benefit.</p> <ul style="list-style-type: none">65,000 people in Illinois ages 55 to 64 with no children, no disability164,000 people in Illinois ages 18 to 64 with school-age children, no disability
10003	<p>Severely restricts the options states have to waive the time limit in areas with elevated rates of unemployment. Every state in the country has elected this option in the past.</p> <p>The proposed language would only allow states to choose to pursue this waiver if a</p>	<p>Illinois has qualified for waivers of the time limit in areas of the state with elevated rates of unemployment for many years and currently has a state-wide waiver through January 31, 2026.¹³</p>



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	county had an unemployment rate of over 10 percent – risking significant harm if the state experiences a recession or local economic downturn.	<p>Right now, no county in Illinois has an unemployment rate over 10%.¹⁴ But adults contend with elevated unemployment rates in many IL cities and towns.¹⁵</p> <p>And, IL has 102 counties of varying geographic size. Within each county cities and towns face vastly different economic situations.</p> <p>Thousands of vulnerable IL adults would be at risk of losing SNAP if this proposal became law. Current estimates of ABAWDs (18-54, no kids) in Illinois is 281,000.</p>
10003	IDHS has an option called “discretionary months” it can use to selectively exempt individuals from the time limit for a single month at a time. The proposal reduces this bucket from a number that equals 8 percent of the individuals required to meet the time limit rules to 1 percent. Congress has repeatedly slashed this state tool (from 15 percent to 12 percent in the 2018 Farm Bill, and from 12 percent to 8 percent in the Fiscal Responsibility Act of 2023).	This would harm IDHS’s ability to selectively extend the time limit for certain vulnerable adults.
10008	Expands the “general work requirements” to include older adults ages 60 through 64. To meet the general work requirement a person must: ¹⁶	These red-tape laden rules increase administrative complexity for IDHS and risk harm for older adults.



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	<ul style="list-style-type: none">• work (paid or unpaid) an average of 20 hours per week (80 hours per month); or• volunteer to take part and comply with one of the following SNAP E&T activities, if available: Basic Education, Vocational Training, Work Experience, Community Workfare, Earnfare; or• do self-initiated Community Service with a community-based organization for an average of 20 hours per week (80 hours per month) to meet the SNAP Work Requirement; or• any combination of the above.	

5. Narrows State Option to Calculate Utilities and Bars Internet Costs

Section	What it would do	Illinois impact
10004	<p>Reduces a state option to calculate shelter costs based on household eligibility for fuel assistance. Utility costs ("Standard Utility Allowance" or SUA) are part of the costs of living that impact the monthly SNAP benefit amount.</p> <p>Illinois uses a state option in current federal law to simplify SUA administration. This option allows IDHS to apply a higher SUA to households who incur heating or air conditioning costs, or who receive fuel assistance.</p>	<p>This would increase administrative burdens for IDHS and risk underpayments to eligible working families and other struggling households who can't navigate the red tape of telling IDHS about their specific utility costs. It may result in a SNAP cut for thousands of working families.</p>



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	The proposal would limit this option to only SNAP households with at least one member who is 60 or older or receiving a disability benefit.	
10005	<p>After an extensive regulatory process, in 2024 USDA acted on a number of public comments by adding internet costs as a relevant part of the SUA. Federal and state agencies recognize internet access is critical in the modern world for low-income households to look for work and participate in school or training programs.</p> <p>The proposal would eliminate this regulation improvement and prohibit states from counting internet costs in the SUA.</p>	Barring internet costs from impacting the SNAP math is a harmful and outdated approach that may cause a small SNAP cut for thousands of Illinois working families.

6. Delays Benefits for Applicants Who Recently Moved Between States

Section	What it would do	Illinois impact
10009	<p>May delay applicants who were getting SNAP in another state and moved from accessing other public benefits they are eligible for that the new state SNAP agency also administers.</p> <p>The proposal does not address how to improve bureaucracy to make sure people who move can readily close their case in the state they left in order to open a new case in the state they moved to.</p>	This proposal could prevent eligible Illinois residents from timely receiving TANF and other cash benefits in addition to SNAP - even after they have verified Illinois residency.

7. Eliminates SNAP Nutrition Education

Section	What it would do	Illinois impact
10011	Eliminate the Nutrition education and obesity prevention grant program	IDHS administers a SNAP Nutrition Education program, ¹⁷ connecting SNAP families to nutrition resources and services. The program would be eliminated. Illinois' FY25 final SNAP-Ed allocation was \$19.8 million ¹⁸ and the state would have to cover the cost if it wanted the program to continue.

Appendix A: Additional information on the threat of a state cost requirement¹⁹

- **Unprecedented state cost requirement would harm SNAP's effectiveness for generations.** SNAP benefits have been paid 100% by the federal government since the modern program was created in 1977 and pilot programs were introduced in 1963. Administration of the program is a 50/50 cost share. Shifting costs onto states will seriously undermine the program's role as the nation's foremost anti-hunger, anti-poverty program.
- Because Illinois must balance its budget, shifting SNAP costs onto the state will force Illinois to cut funding for other priorities to fund SNAP, further shrink already tight eligibility rules, and/or harm its commitment to closing participation gaps and reaching eligible households. It is also unclear what will happen if the state can't pay the total share. Even without explicit authority to cut benefits, states could also cut SNAP benefit costs and take food assistance away entirely from some households by dropping state options they have used to better meet their residents' needs or by creating administrative hurdles that would make it harder for people to apply for and maintain eligibility.²⁰
- Requiring states to allocate additional funds for program administration in the short term will likely result in higher error rates by FY28. Requiring states to pay more to run the program means states will have to shrink their overall administrative costs – this means fewer workers, fewer IT improvements, and worse customer service.
- Major reductions to USDA Food and Nutrition Service (FNS) staffing further harm the ability of states and federal government to work together to address the root cause of errors. Many USDA FNS staff with SNAP expertise were fired by the current administration or took resignation packages. The federal government's technical expertise and oversight needed to reduce errors is now sorely lacking.



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- Furthermore, this cost share structure to drive down error rates is unnecessary because USDA already assesses fines for states with error rates and promotes investments in program improvements. If a state has an elevated error rate that exceeds the national average by more than 105% for two consecutive fiscal years, FNS will apply a fiscal sanction. Historically, when FNS applied a sanction (“error rate liability”), it allowed states to invest half the amount of the sanction into program improvements to reduce the error rate and waived the second half if the state successfully reduced its error rate. Essentially charging states significantly more in a state cost requirement when error rates are elevated entirely upends this system that has served the program well for decades.
- The error rate (“Quality Control” or QC) disregards overpayments and underpayments below a low threshold – this is called the “error tolerance threshold.” In FY25, the threshold amount is \$57. Starting FY26, Sec. 10010 would eliminate the threshold (by reducing it to \$0). This would mean IDHS has an error even in cases where a mistake caused a \$1 or \$2 over or under issuance. Running the QC system without a reasonable error tolerance threshold is a foolish and unnecessary waste of state administrative resources – and, because it does not actually reflect systemic problems, it would be expected to artificially increase the error rate (increasing the state cost requirement).
 - In addition, FNS establishes regulations and policies that have the potential to change the error rate by changing the way cases are sampled, and statistical analysis is conducted. This means that the administration could take steps to change how it calculates errors, and – misleadingly - inflate the error rate (resulting in even higher state cost percentages).

Appendix B: Additional information on the vast expansion of SNAP work requirements²¹

- The House Agriculture committee has proposed the most drastic expansion of SNAP Work Requirements (SNAP time limit)²² since the time limit was created by the 1996 Welfare Reform law. Decades of evidence show work requirements don’t work for people public benefit programs²³ and SNAP specifically.^{24, 25}
 - Ignore systemic barriers in the labor market. The proposed expansion does nothing to create good, consistent jobs, expand training programs, or provide affordable, accessible child care.
 - Increase hunger and poverty for adults struggling to get and stay connected to good jobs.
 - Create massive red-tape and burden that undermines employment and terminates SNAP for adults who should be exempt from the rules.
 - In practice, removes participants from SNAP but does not lead to increased employment or earnings.



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Notes and Citations:

¹ Center on Budget and Policy Priorities (CBPP), "House Agriculture Committee Proposal Would Worsen Hunger, Hit State Budgets Hard," Table 1: States Would Be Hit Hard by the 5% to 25% Cost-Shift in the House Agriculture Committee's Reconciliation Bill, 13 May 2025, <https://www.cbpp.org/research/food-assistance/house-agriculture-committee-proposal-would-worsen-hunger-hit-state-budgets>.

² In FY23 the national average was 11.68%. Most states had error rates higher than pre-pandemic levels due to unwinding from federal pandemic flexibilities. Between 2003 and 2023, Illinois' lowest error rate was 1.7 and its highest was 10.91. See Appendix A for more information about the error rate. See: USDA, "Fiscal Year 2023 SNAP Quality Control Payment Error Rates," 28 June 2024, <https://fns-prod.azureedge.us/sites/default/files/resource-files/snap-fy23-qc-payment-error-rate.pdf>.

³ CBPP, "House Agriculture Committee Proposal Would Worsen Hunger, Hit State Budgets Hard," 13 May 2025.

⁴ Estimates calculated based on Illinois' FY2023 share of administrative costs being \$166.7 million at the current 50% match; see USDA, "SNAP State Activity Report FY2023," Table 8: State Agency SNAP Administrative Costs – FY 2023, published May 2025, <https://fns-prod.azureedge.us/sites/default/files/resource-files/snap-sar-fy23.pdf>.

⁵ CBPP, "Chair Thompson's Plan Would Cut SNAP Benefits and Ignore Scientific Evidence in Thrifty Food Plan Updates," Figure 1: 2021 Thrifty Food Plan Revision Meaningfully Increased Average SNAP Benefits Per Person Per Day, 18 April 2024, <https://www.cbpp.org/research/food-assistance/chair-thompsons-plan-would-cut-snap-benefits-and-ignore-scientific>.

⁶ Urban Institute, "Does SNAP Cover the Cost of Meal in Your County?," 20 May 2024, <https://www.urban.org/data-tools/does-snap-cover-cost-meal-your-county>.

⁷ Food Research & Action Center (FRAC), "Protect SNAP to Reduce Hunger and Strengthen Local Economies in Illinois," March 2025, https://frac.org/wp-content/uploads/SNAP_FactSheets_022525_IL14.pdf.

⁸ USDA, "SNAP Key Statistics and Research," Chart: Percent of population receiving SNAP benefits in fiscal year 2023, 06 January 2025, <https://www.ers.usda.gov/topics/food-nutrition-assistance/supplemental-nutrition-assistance-program-snap/key-statistics-and-research>.

⁹ House Committee on Agriculture, "Committee print to comply with reconciliation directives included in H. Con. Res. 14 Section 2001(B)(1)," released 12 May 2025, <https://docs.house.gov/meetings/AG/AG00/20250513/118259/BILLS-119pih-CommitteePrint-U1.pdf>.

¹⁰ USDA's FFY23 Characteristics of State Plans, Table B-16 identified that of the 1.97 million IL SNAP recipients, 1.9 are US citizens (US born and naturalized); 11,000 are refugees and 52,000 were "other non-citizens" include LPRs, asylees, humanitarian parolees, Cuban/Haitian entrants etc. USDA's FFY23 report does not break down participation further. See: <https://www.fns.usda.gov/research/snap/characteristics-fy23>.

¹¹ CBPP "Expanded Work Requirements in House Republican Bill Would Take Away Food Assistance from Millions: State and Congressional District Estimates," Table 1: Millions At Risk of Losing Food Assistance Under Proposed Expansion of SNAP's Work Requirement, 13 May 2025, <https://www.cbpp.org/research/food-assistance/expanded-work-requirements-in-house-republican-bill-would-take-away-food>

¹² Calculation assumes 1,935,645 average persons participating in SNAP per month in Illinois FY24. FRAC, "Protect SNAP to Reduce Hunger and Strengthen Local Economies in Illinois," March 2025.

¹³ USDA, Letter Re: SNAP – Illinois Request to Waive Able-Bodied Adults Without Dependents Time Limit – Initial – Partial Approval, 14 March 2025, <https://fns-prod.azureedge.us/sites/default/files/resource-files/il-abawd-response-fy2025-b.pdf>.

¹⁴ Illinois Department of Employment Security, "Current Monthly Unemployment Rates March 2025: Counties, not seasonally adjusted," accessed 15 May 2025, <https://ides.illinois.gov/resources/labor-market-information/laus/current-monthly-unemployment-rates.html>.

¹⁵ For example, the U.S. Department of Labor (DOL) has 26 IL cities and towns listed as Labor Surplus Areas (meaning they had a two year unemployment rate of 6% or higher) including: Belvidere City (8.41%), Harvey City (8.15%), Kankakee City (8%), Rockford City (7.14%), East St. Louis (7.11%), Alexander County (6.46%), and Danville City (6.22%). Under current law, IDHS can seek to waive the



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time limit in LSAs. Under the proposed language, residents in all of these areas would be subject to the punitive rules, and likely be cut-off from SNAP despite facing a weak job market where they live. See: DOL, "Labor Surplus Area List FY 2025," accessed 15 May 2025, <https://www.dol.gov/agencies/eta/lisa>.

¹⁶ Illinois Department of Human Services (IDHS), PM 03-25-05: How to Meet the Work Requirement, <https://www.dhs.state.il.us/page.aspx?item=14752>.

¹⁷ University of Illinois SNAP-Ed, see: <https://dlarge.web.illinois.edu/who-we-are/our-story/snap-ed>.

¹⁸ USDA, "FY 2025 Supplemental Nutrition Assistance Program Nutrition Education (SNAP-Ed) Final Allocations," 29 August 2024, https://snaped.fns.usda.gov/sites/default/files/documents/SNAPFY2025FinalSNAP-EdAllocationsMemoAugust2024_0.pdf.

¹⁹ Summary based on information from the Massachusetts Law Reform Institute (MLRI).

²⁰ CBPP, "Imposing SNAP Food Benefit Costs on States Would Worsen Hunger, Hurt States' Ability to Meet Residents Needs," revised 21 March 2025, <https://www.cbpp.org/research/food-assistance/imposing-snap-food-benefit-costs-on-states-would-worsen-hunger-hurt-states>.

²¹ Summary based on information from the Massachusetts Law Reform Institute (MLRI).

²² CBPP, "Worsening SNAP's Harsh Work Requirement Would Take Food Assistance Away From Millions of Low-Income People," 30 April 2025, <https://www.cbpp.org/research/food-assistance/worsening-snaps-harsh-work-requirement-would-take-food-assistance-away>.

²³ Georgetown Law Center on Poverty and Inequality, "Work Requirements Are Unworkable," 20 March 2025, <https://www.georgetownpoverty.org/issues/work-requirements-are-unworkable/>.

²⁴ The Hamilton Project, "A primer on SNAP work requirements," 7 April 2025, <https://www.hamiltonproject.org/publication/paper/a-primer-on-snap-work-requirements/>.

²⁵ Testimony of Dr. Diane Whitmore Schanzenbach, Margaret Walker Alexander Professor of Human Development and Social Policy, and of Economics, Northwestern University on the subject of "The Power of Work: Expanding Opportunity through SNAP" before the U.S. House of Representatives Committee on Agriculture, 8 April 2025, <https://docs.house.gov/meetings/AG/AG00/20250408/118092/HHRG-119-AG00-Wstate-SchanzenbachD-20250408-U1.pdf>.