

# Analysis of Supplemental Nutrition Assistance Program (SNAP) Cuts via Budget Reconciliation and the Harm to Illinois

(Updated July 10, 2025)

The <u>Budget Reconciliation bill (H.R. 1)</u><sup>1</sup> passed in Congress and signed by the President on July 4, 2025 **will severely cut SNAP** and harm millions of **households – including 16.2% of IL residents currently on SNAP**. This document (subject to change)\* analyzes the provisions included in the final bill<sup>2</sup> and the impact on low-income Illinois households.

#### 1. Increases State Cost Requirements to Unprecedented Levels

**History of SNAP funding:** Since the modern SNAP program (formerly known as Food Stamps) was created in 1977 and pilot programs were introduced in 1963, SNAP benefits have been 100% federally funded. State SNAP agencies are responsible for 50% of the costs of administering SNAP while the federal government reimburses 50%. **See** *Appendix A* **for more information on the state cost requirement.** 

Section(s)	Final Budget Reconciliation Bill (H.R. 1)	Illinois impact
State SNAP benefit cost requirement.	Starting FFY2028 (Oct. 1, 2027), <sup>3</sup> some states would be required to pay a portion of SNAP benefits.	In FFY24 IL had an error rate of 11.56% which would put the state in the 15% cost requirement category. However, the state has the ability to base its cost share on either FFY25 or FFY26 payment error rates if
Sec. 10105	State costs will be determined by their payment error rates (a measure of over- and underpayments that largely reflects	it remains under 13.33% and implementation is not delayed.
	unintentional clerical mistakes) <sup>4</sup> :	The Illinois Department of Human Services (IDHS) estimates that Illinois' current, projected state match would cost an additional
	<ul> <li>If a state has a payment error rate of less than 6%, there is no state matching requirement.</li> </ul>	<b>\$705M</b> annually based on the current <b>\$4.7B</b> in SNAP benefits issued in FY2025. <sup>78</sup>
	<ul> <li>Between 6 and 8% payment error rate, a state must pay 5% of benefit costs.</li> <li>Between 8 to 10%, a state must pay 10% of benefit costs.</li> </ul>	Furthermore, IDHS estimates that this combined with the increased administrative burdens (those outlined below and those needed to

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<sup>\*</sup> Questions or comments, contact Danielle Perry, <a href="mailto:deerng-will-cause-unprecedented-and-woidable-hunger/">deerng@gcfd.org</a>, or Beth Kenefick, <a href="mailto:ekenefick@gcfd.org">ekenefick@gcfd.org</a>. Read the Greater Chicago Food Depository's statement on the harmful cuts to SNAP and Medicaid passed in the final federal budget reconciliation package (July 03, 2025) at <a href="https://www.chicagosfoodbank.org/news/catastrophic-cuts-to-snap-will-cause-unprecedented-and-avoidable-hunger/">https://www.chicagosfoodbank.org/news/catastrophic-cuts-to-snap-will-cause-unprecedented-and-avoidable-hunger/</a>.

Section(s)	Final Budget Reconciliation Bill (H.R. 1)	Illinois impact
	<ul> <li>If the error rate is over 10%, a state must pay 15% of benefit costs.</li> <li>If the error rate is over 13.33%, a state may delay the cost shift.</li> <li>For the first year, states will choose if they use their FFY2025 or FFY2026 payment error rate (unless implementation date is delayed as noted below). For FFY2029 and after, the state's cost requirement will be based on the error rate for the fiscal year 3 years prior. Note, payment is required even if the payment error rate goes down below 6% in the years between the fiscal year with the error rate over 6% and the year the payment is required.</li> <li>The implementation date for this provision is later- FFY2029 (Oct. 1, 2028) - only for states with payment error rates above 13.33% in FFY2025, with an opportunity for an additional year of postponement.</li> <li>Additionally, the final bill does not include changes to the threshold for how errors are calculated.<sup>5</sup></li> </ul>	implement the new federal changes) will total more than \$800million/year.  If Illinois is unable to cover and sustain this share of benefit costs, they may be forced to end existing state options which make it easier for eligible individuals to enroll in benefits (e.g., Broad Based Categorical Eligibility, etc.) in order to lower caseloads.  Assuming it will not be allowable for states to pay only a partial match of the benefit costs, and they will have no authority to reduce costs (i.e., they cannot violate SNAP law through benefit cuts or changes to eligibility, for example) some states may opt out of the federal SNAP program all together or create more limited programs with state-only funding.9
Increased state admin costs. Sec. 10106	Starting FFY 2027 (Oct. 1, 2026), states will be responsible for 75% of administrative costs (versus 50%).	IDHS estimates this will cost the state an additional \$80 million/year. <sup>10</sup> As noted above, the state also estimates that implementing the new federal changes will have an increased administrative burden of \$20 million/year.  This impacts funding the Illinois Department of Human Services (IDHS) uses to pay and train SNAP case managers, update IT systems, do SNAP outreach, and make sure SNAP benefits are paid accurately and timely.

#### 2. Cuts SNAP By Preventing Future Updates to Benefit Amount

**History:** In the 2018 Farm Bill, Congress directed the United States Department of Agriculture (USDA) to re-evaluate the underlying food costs used for SNAP benefit amounts (aka the "Thrifty Food Plan"). As a result, in 2021 USDA updated the Thrifty Food Plan (TFP) for the first time in 50 years. SNAP benefits are now based on scientific nutrition standards, modern food preparation, and food costs.

Section(s)	Final Budget Reconciliation Bill (H.R. 1)	Illinois impact
Sec. 10101	Prohibits USDA from making future increases to the cost of the TFP - essentially freezing SNAP benefit amounts outside of cost-of-living adjustments, without regard for future changes to nutrition standards, food purchasing patterns, or systemic changes in food costs.  The bill requires that the next cost-neutral evaluation of the TFP market basket occur on or after October 1, 2027. There will no longer be a requirement for reevaluation to occur every 5 years.  USDA adjust future SNAP benefits only through annual inflation adjustments based on changes in the Consumer Price Index for All Urban Consumers.	SNAP benefit amounts are still too low. Across IL, on average the cost of a meal is <b>17% higher</b> than the average SNAP benefit per meal (\$2.84), with 26 of our state's 102 counties over 20% higher. Treezing the 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. The Congressional Budget Office says this represents a \$35 billion cut to benefits from 2027-2034.  This freeze will result in <b>reductions to the true value of SNAP benefits for every IL SNAP household in the future</b> of which currently, <b>1.8 million residents</b> rely on SNAP in Illinois ( <b>16.2% of the population</b> in 2023 <sup>13</sup> ).  It will also result in a future cut to the value of other benefits tied to TFP adjustments, including Summer EBT and the Emergency Food Assistance Program (TEFAP).

#### 3. Bars SNAP Benefits for Many Legally Present Immigrants

History: Most low-income legally present immigrants have long been eligible for federal SNAP benefits. The 1996 Welfare Reform Law narrowed SNAP eligibility to "qualified" immigrants who are Lawful Permanent Residents (LPR) or have certain humanitarian protections, including refugees, those granted political asylum, immigrant survivors of domestic violence (VAWA petitioners), survivors of labor or sex trafficking, and certain nationals of Cuba or Haiti with specific statuses. Federal SNAP law also imposes a 5-year waiting period on many LPRs, parolees, and battered/VAWA immigrants. The 2002 Farm Bill exempted LPR children and severely disabled LPR adults from the 5-year wait for benefits eligibility. Undocumented immigrants have never been SNAP eligible, nor have immigrants with Temporary Protected Status, Deferred Action and other non-qualified statuses.

Section(s)	Final Budget Reconciliation Bill (H.R. 1)	Illinois impact
Sec. 10108	Immediately upon passage, the bill bars from SNAP all immigrants who are not Legal Permanent Residents (LPR), certain Cuban entrants, or COFA citizens. <sup>14</sup> Immigrants granted official humanitarian protections (refugees, asylees, etc.) and those who have long been recognized as "qualified" for federal benefits would lose eligibility.	This change is a stark departure from America's long standing, bipartisan commitment to people fleeing violence and persecution.  Recent USDA data does not break down SNAP recipients by immigrant type to be able to fully estimate the impact of this proposal. It states there could be 11,000 legally present refugees in Illinois on SNAP in addition to a portion of the 52,000 "other non-citizens".   IDHS estimates this population who will lose SNAP access to be 20,000.

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

History of the SNAP time limit: In 1996, Congress established the 3-month time limit in the Welfare Reform Act. Adults aged 18 to 55 are limited to 3 months of SNAP benefits in a 3 year period unless they are exempt from or meet the strict work requirements<sup>16</sup> (these rules were suspended nationwide during the Great Recession and the COVID-19 pandemic). Adults subject to the time limit requirements would only be able to receive food benefits for 3 months in a 3-year period unless they show compliance with a 20-hour-per-week work requirement or prove they qualify for an exemption such as having a disability. This is considered an Able-Bodied Adult Without Dependents (ABAWDs).

The 3-month time limit has never applied to parents/caretakers of children or adults over 54. Congress expanded the time limit to include adults ages 50-54 in the Fiscal Responsibility Act (FRA) of 2023 and added specific exemptions for adults who are experiencing homelessness, veterans, or former foster youth under age 24; but sunset the expanded age range and new exemptions on October 1, 2030. See *Appendix B* for more information on the time limit.

Section(s)	Final Budget Reconciliation Bill (H.R. 1)	Illinois impact
Expands the 3- month time limit.	Immediately upon passage, expands the time limit by editing the ABAWD definition to include:  Older adults until they turn age 65.	IDHS estimates that the changes to who is considered an ABAWD increases the population from 190,000 to nearly <b>450,000</b> (or nearly 25% of the Illinois SNAP caseload). <sup>17</sup>
Sec. 10102	<ul> <li>Parents, grandparents or other caregivers of children age 14 or older.</li> <li>Adults experiencing homelessness (including homeless families if children are 14 or older).</li> <li>Veterans.</li> <li>Former foster youth up to age 24</li> <li>The bill adds an exemption for an individual who is:         <ul> <li>An Indian or Urban Indian (as such terms are defined in paragraphs (13) and (28) of section 4 of the Indian Health Care Improvement Act); or</li> <li>A California Indian described in section 809(a) of the Indian Health Care Improvement Act.</li> </ul> </li> </ul>	By imposing bureaucratic work requirements on that <i>entire</i> , increased population, more than <b>340,000</b> individuals are at risk of losing lifesustaining food benefits. This change imposes extensive paperwork requirements on participants and administrative staff and increases risks that someone will lose benefit access because of clerical errors or variable monthly work hours from employers. Furthermore, families of these individuals would lose a substantial portion of the monthly SNAP benefit they rely on to feed their family.

**History of geographic waivers:** States can choose to request permission from USDA to waive the time limit for adults who live in areas of the state with elevated rates of unemployment based on certain unemployment data standards. Every state in the country has elected to use this option in the past. 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.<sup>18</sup>

Section(s)	Final Budget Reconciliation Bill (H.R. 1)	Illinois impact
Sec. 10102	Immediately upon passage, the bill severely restricts the options states have to waive the time limit in areas with elevated rates of unemployment. <sup>19</sup>	Right now, no county in Illinois has an unemployment rate over 10%, <sup>20</sup> but adults are impacted by elevated unemployment rates in many IL cities and towns. <sup>21</sup>
	It only allows states to choose to pursue a waiver if the USDA Secretary determines the area in which the individuals live has an unemployment rate of over 10 percent or doesn't have sufficient jobs. The bill does not define "area."	<b>Thousands of vulnerable IL adults</b> would be at risk of losing SNAP if this proposal became law. As noted above, estimates newly defined ABAWDs population in Illinois is <b>450,000</b> according to IDHS.

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

**Current law:** Certain types of utility costs - including internet costs - count in the SNAP benefit calculation. Utility costs are calculated in a standard way (called a "Standard Utility Allowance", or SUA). Illinois uses a state option in current federal law to simplify SUA administration for households who receive fuel assistance payments.

Section(s)	Final Budget Reconciliation Bill (H.R. 1)	Illinois impact
Fuel assistance and SNAP utility costs. Sec. 10103	Immediately upon passage, receipt of a LIHEAP fuel assistance payment would no longer automatically qualify households for a Standard Utility Allowance (SUA) for households without an elderly (over 60) or disabled member.	This would increase administrative burdens for IDHS and risk underpayments to eligible households who can't navigate the red tape of reporting specific utility costs to IDHS. It may result in a SNAP benefit reduction for thousands of households.
Internet costs. Sec. 10104	After a thorough regulatory process, in 2024 USDA responded to extensive 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.  The bill would immediately eliminate this regulatory improvement and prohibit states from counting internet costs (such as monthly subscriber fees, recurring taxes and fees charged to the household, the cost of modem rentals, fees charged by the provider for initial installation, and other related costs) in the SUA.	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 households.

## 6. Eliminates SNAP Nutrition Education

**Current law:** IDHS administers a SNAP Nutrition Education program,<sup>22</sup> connecting SNAP families to nutrition resources and services.

Section(s)	Final Budget Reconciliation Bill (H.R. 1)	Illinois impact
Sec. 10107	Eliminates the Nutrition education and obesity prevention grant program ("SNAP-Ed") starting FFY2026 (Oct. 1, 2025). Currently, programs funded by SNAP-Ed provide education on food choices, nutrition and health cooking demonstration/classes to help improve diet-related chronic diseases like obesity for SNAP participants.	The SNAP Nutrition Education program would be eliminated. Illinois' FY25 final SNAP-Ed allocation was \$19.8 million <sup>23</sup> and the state would have to cover the cost if it wanted the program to continue.  In Illinois, SNAP-Ed is provided by University of Illinois Extension and University of Illinois Chicago as Eat.Move.Save. SNAP-Ed helps Illinois families improve their food and activity choices, stretch their food dollars, and increase access to healthy foods. If the program is eliminated 1,800 Illinois organizations will lose access to these funded services. <sup>24</sup>

# Appendix A: Additional information on the threat of a state cost requirement<sup>25</sup>

The bill's imposition of a state cost requirement is unprecedented and will 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. States pay 50% of administrative costs to run the program including paying case workers, doing training, and updating IT systems. The reconciliation bill could adversely impact Illinois in multiple ways:

- Undermines access and program integration: 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 ending 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.<sup>26</sup>
- Harms SNAP's role as an economic stabilizer: By requiring states to pay more when more households are on SNAP, a state cost requirement undercuts SNAP's essential role in combating hunger and poverty (by disincentivizing enrollment). And, according to an analysis by the Urban Institute, because Illinois would need to pay more when households face financial strain and apply, a state cost shift would seriously constrain the ways SNAP acts as a stabilizing force during recessions and economic downturns.<sup>27</sup> Recent analysis by the Brookings Institution outlines in greater detail how the proposed SNAP cuts would permanently undermine recession readiness and responsiveness.<sup>28</sup>
- Increase administrative errors: Requiring states to pay substantially more to administer the program (from 50% to 75%) could actually increase state payment error rates by FFY28 (and in each year after). 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.

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 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. Charging states significantly more when error rates are elevated entirely upends this system that has served the program well for decades.

# Appendix B: Additional information on the vast expansion of SNAP work requirements<sup>29</sup>

Time limits and harsh work rules are punitive, ineffective, and rely on red-tape barriers to exclude otherwise eligible low-income households. Congress and this administration have passed the most drastic expansion of SNAP Work Requirements (or

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the SNAP time limit)<sup>30</sup> 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 programs<sup>31</sup> and SNAP specifically.<sup>32</sup>,<sup>33</sup>

- 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 and adequate transportation.
- o Imposes work requirements on parents, grandparents and other caregivers who need to supervise children after school and during school vacations and breaks. These rules fail to recognize the demands on parents who provide home schooling, provide child care after school or during breaks, or need to be home for a sick child. Most entry level or minimum wage jobs are not designed for caregivers and may force parents to leave children unsupervised.
- O Takes food off the table for children: Households with a disqualified member, like a parent, receive a dramatically lower monthly food benefit threatening food insecurity for the entire household. For the first time, Congress has pushed this harm onto children. A family's food budget covers the whole family not just those who remain on SNAP.
- O **Undermines recession readiness and responsiveness:** As the Brookings Institution emphasizes, vastly expanding the time limit while also harshly curtailing the options states have to waive the time limit when unemployment is elevated undermines SNAP's role in combating recessions and will ham workers during economic downturns. <sup>34</sup>
- Create massive red-tape and burden that undermines employment and terminates SNAP for adults who should be exempt from the rules.

#### **Notes and Citations:**

<sup>&</sup>lt;sup>1</sup> https://www.congress.gov/bill/119th-congress/house-bill/1/text.

<sup>&</sup>lt;sup>2</sup> Earlier versions of this analysis reviewed what was included in H.R.1 that passed the House on May 22, and the Senate bill proposed by the Senate Agriculture Committee on June 11. See: <a href="https://www.chicagosfoodbank.org/wp-content/uploads/2025/06/House-and-Senate-Committee-Budget-Reconciliation-Analysis-of-SNAP-Cuts-and-Illinois-Impact">https://www.chicagosfoodbank.org/wp-content/uploads/2025/06/House-and-Senate-Committee-Budget-Reconciliation-Analysis-of-SNAP-Cuts-and-Illinois-Impact</a> 6.16.2025-1.pdf.

<sup>&</sup>lt;sup>3</sup> The final legislation postpones this year until FFY2029 (Oct. 1, 2028) for states with payment error rates above 13.33% in FFY2025. The year is postponed until FFY2030 (Oct. 1, 2029) for states with error rates in FFY2026 above 13.33%.

<sup>&</sup>lt;sup>4</sup> Center on Budget and Policy Priorities (CBPP), "SNAP Includes Extensive Payment Accuracy System," 21 June 2024, <a href="https://www.cbpp.org/research/food-assistance/snap-includes-extensive-payment-accuracy-system">https://www.cbpp.org/research/food-assistance/snap-includes-extensive-payment-accuracy-system</a>.

<sup>&</sup>lt;sup>5</sup> As noted in earlier analyses, House bill H.R.1 proposed making all under or overpayments pulled for the sample - even \$1 or \$2 mistakes - payment errors. Under current law, states exclude payment errors when the amount is \$57 or lower. This would artificially inflate the error rate. This was not included in the original Senate Agriculture Committee proposal nor the final legislation.

<sup>&</sup>lt;sup>6</sup> In FY24 the national average was 10.93%. 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 2024 SNAP Quality Control Payment Error Rates," 30 June 2025, <a href="https://fns-prod.azureedge.us/sites/default/files/resource-files/snap-fy24QC-PER.pdf">https://fns-prod.azureedge.us/sites/default/files/resource-files/snap-fy24QC-PER.pdf</a>.

<sup>&</sup>lt;sup>7</sup> All Illinois Department of Human Services (IDHS) estimates in this analysis are based on the "IDHS SNAP Executive Summary" released 10 July 2025. As details and guidance continues to come out from the U.S. Department of Agriculture we assume these estimates may change.

<sup>8</sup> This aligns with previous external analyses shared that suggested Illinois would need to pay \$666 million/year at the 15% rate. See: CBPP,

<sup>&</sup>quot;Research Note: Senate Republican Leaders' Proposal Risks Deep Cuts to Food Assistance, Some States Ending SNAP Entirely," 30 June 2025, https://www.cbpp.org/research/food-assistance/senate-republican-leaders-proposal-risks-deep-cuts-to-food-assistance-some.

<sup>&</sup>lt;sup>9</sup> CBPP, "Research Note: Senate Republican Leaders' Proposal Risks Deep Cuts to Food Assistance, Some States Ending SNAP Entirely."

<sup>&</sup>lt;sup>10</sup> Original estimates was \$83million/year 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, <a href="https://fns-prod.azureedge.us/sites/default/files/resource-files/snap-sar-fy23.pdf">https://fns-prod.azureedge.us/sites/default/files/resource-files/snap-sar-fy23.pdf</a>.

- <sup>11</sup> Urban Institute, "Does SNAP Cover the Cost of Meal in Your County?," 20 May 2024, <a href="https://www.urban.org/data-tools/does-snap-cover-cost-meal-your-county">https://www.urban.org/data-tools/does-snap-cover-cost-meal-your-county</a>.
- <sup>12</sup> Food Research & Action Center (FRAC), "Protect SNAP to Reduce Hunger and Strengthen Local Economies in Illinois," March 2025, <a href="https://frac.org/wp-content/uploads/SNAP">https://frac.org/wp-content/uploads/SNAP</a> FactSheets 022525 IL14.pdf.
- <sup>13</sup> 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.
- <sup>14</sup> COFA refers to Compacts of Free Association citizens of the Federated States of Micronesia, the Republic of the Marshall Islands, and the Republic of Palau.
- <sup>15</sup> 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: <a href="https://www.fns.usda.gov/research/snap/characteristics-fy23">https://www.fns.usda.gov/research/snap/characteristics-fy23</a>.
- <sup>16</sup> 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.
- <sup>17</sup> 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.
- <sup>18</sup> 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.
- <sup>19</sup> The bill allows Alaska and Hawaii to ask USDA to waive the time limit if the state's unemployment rate was 1.5 times or more above the national unemployment rate. This waiver option is only for Alaska and Hawaii and must be requested by the State and their availability will expire by December 31, 2028.
- <sup>20</sup> Illinois Department of Employment Security, "Current Monthly Unemployment Rates March 2025: Counties, not seasonally adjusted," accessed 15 May 2025, <a href="https://ides.illinois.gov/resources/labor-market-information/laus/current-monthly-unemployment-rates.html">https://ides.illinois.gov/resources/labor-market-information/laus/current-monthly-unemployment-rates.html</a>.
- <sup>21</sup> For example, the U.S. Department of Labor (DOL) has 26 IL cities and towns listed as <u>Labor Surplus Areas</u> (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 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/lsa.
- <sup>22</sup> University of Illinois SNAP-Ed, see: <a href="https://dlarge.web.illinois.edu/who-we-are/our-story/snap-ed">https://dlarge.web.illinois.edu/who-we-are/our-story/snap-ed</a>.
- <sup>23</sup> 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.
- <sup>24</sup> University of Illinois System, "Support SNAP-Ed" Campaign, June 2025, https://uillinois.quorum.us/campaign/126706/.
- <sup>25</sup> Summary based on information from the Massachusetts Law Reform Institute (MLRI).
- <sup>26</sup> CBPP, "Imposing SNAP Food Benefit Costs on States Would Worsen Hunger, Hurt States' Ability to Meet Residents Needs," revised 21 March 2025, <a href="https://www.cbpp.org/research/food-assistance/imposing-snap-food-benefit-costs-on-states-would-worsen-hunger-hurt-states">https://www.cbpp.org/research/food-assistance/imposing-snap-food-benefit-costs-on-states-would-worsen-hunger-hurt-states</a>.
- <sup>27</sup> Urban Institute, "How Would a State Cost Share Affect SNAP in a Recession?," 2025, <a href="https://digitalgovernmenthub.org/library/how-would-a-state-cost-share-affect-snap-in-a-recession/">https://digitalgovernmenthub.org/library/how-would-a-state-cost-share-affect-snap-in-a-recession/</a>.
- <sup>28</sup> Bauer and Whitmore Schanzenbach, the Brookings Institution, "Proposed SNAP cuts would permanently undermine recession readiness and responsiveness," 04 June 2025, <a href="https://www.brookings.edu/articles/proposed-snap-cuts-would-permanently-undermine-recession-readiness-and-responsiveness/">https://www.brookings.edu/articles/proposed-snap-cuts-would-permanently-undermine-recession-readiness-and-responsiveness/</a>.
- <sup>29</sup> Summary based on information from the Massachusetts Law Reform Institute (MLRI).
- <sup>30</sup> 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.
- <sup>31</sup> Georgetown Law Center on Poverty and Inequality, "Work Requirements Are Unworkable," 20 March 2025, https://www.georgetownpoverty.org/issues/work-requirements-are-unworkable/.
- <sup>32</sup> The Hamilton Project, "A primer on SNAP work requirements," 7 April 2025, <a href="https://www.hamiltonproject.org/publication/paper/a-primer-on-snap-work-requirements/">https://www.hamiltonproject.org/publication/paper/a-primer-on-snap-work-requirements/</a>.
- <sup>33</sup> 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, <a href="https://docs.house.gov/meetings/AG/AG00/20250408/118092/HHRG-119-AG00-Wstate-SchanzenbachD-20250408-U1.pdf">https://docs.house.gov/meetings/AG/AG00/20250408/118092/HHRG-119-AG00-Wstate-SchanzenbachD-20250408-U1.pdf</a>.
- <sup>34</sup> Bauer and Whitmore Schanzenbach, the Brookings Institution, "Proposed SNAP cuts would permanently undermine recession readiness and responsiveness," 04 June 2025, <a href="https://www.brookings.edu/articles/proposed-snap-cuts-would-permanently-undermine-recession-readiness-and-responsiveness/">https://www.brookings.edu/articles/proposed-snap-cuts-would-permanently-undermine-recession-readiness-and-responsiveness/</a>.