

Congress of the United States

Washington, DC 20515

October 27, 2025

The Honorable Brooke Rollins
Secretary, U.S. Department of Agriculture
1400 Independence Avenue, S.W.
Washington, D.C. 20250

Dear Secretary Rollins,

We write to express serious concern with the changes to Supplemental Nutrition Assistance Program (SNAP)'s Able-Bodied Adults Without Dependents (ABAWD) time limit included in Section 10102 the *One Big Beautiful Bill Act of 2025* ("OBBA") and the implementation guidance outlined in the recent memorandums issued by USDA's Food and Nutrition Service (FNS).¹

The expansion of the ABAWD time limit will have far-reaching consequences for Illinois families, farmers, and the broader food economy. The unrealistic timeline that USDA has set for states to implement these complex policy changes, especially in the absence of full implementation guidance, will dramatically exacerbate this harm. We urge you to provide states with the maximum amount of flexibility as they work to implement these complex policy changes, including by retaining Illinois's approved waiver of the time limit until its scheduled expiration on January 31, 2026.

Under USDA's interpretation, immediately upon enactment of the OBBA on July 4, 2025, the ABAWD time limit expanded to include additional populations, including veterans, young adults who have aged out of foster care, caretakers for children ages 14 to 17, and older adults ages 55 to 64. Previously, these populations were exempt from the additional hurdles that the ABAWD time limit imposes on individuals to maintain eligibility for food assistance each month. Now, they will need to complete additional paperwork to certify their compliance with work rules or prove they qualify for an exemption. After 3 months, those who cannot do so will lose access to food assistance for up to 3 years. USDA also recently announced they would terminate all previously approved waivers of the time limit on November 2, accelerating the harm of this harsh policy for people living in areas with limited job opportunities in Illinois and many other states.

In Illinois, an estimated 360,000 people who rely on SNAP will be affected by these and other changes from the new law—nearly one in five current participants.² These are Illinoisans in rural and urban communities alike. Research consistently shows that SNAP's harsh work requirement does not increase employment or earnings.³ Instead, losing access to food assistance will deepen food insecurity, worsen health outcomes, and increase poverty for the affected populations. Without SNAP benefits, Illinoisans seeking food assistance will increasingly rely on state and local emergency food systems and nonprofit organizations. Unfortunately, these systems and organizations will not be able to absorb the expected increase in demand due to the changes to the ABAWD time limit; according to the Greater Chicago Food Depository, for every meal the organization provides, SNAP provides nine.⁴

¹ U.S. Department of Agriculture, Food and Nutrition Service, *Supplemental Nutrition Assistance Program (SNAP) Provisions of the One Big Beautiful Bill Act of 2025 – ABAWD Exceptions – Implementation Memorandum*, released October 3, 2025. <https://www.fns.usda.gov/snap/obbb-ABAWD-exemptions-implementation-memo>

² Office of Governor JB Pritzker, *Gov. Pritzker and Local Leaders Discuss Impact of Trump's Food Assistance Cuts*, Press Release, 2025. <https://gov-pritzker-newsroom.prezly.com/gov-pritzker-and-local-leaders-discuss-impact-of-trumps-food-assistance-cuts>

³ The Hamilton Project. "A Primer on SNAP Work Requirements." Brookings Institution, 2024. Available at: <https://www.hamiltonproject.org/publication/paper/a-primer-on-snap-work-requirements/>

⁴ *Crain's Chicago Business*, *SNAP Changes Expected to Shake Illinois' Food System*, 2025. <https://www.chicagobusiness.com/crains-forum-state-and-local-food-policy/snap-changes-expected-shake-illinois-food-system>

The effects of these changes extend beyond individual households, posing risks to Illinois' food and agricultural economy. SNAP supports stable consumer demand and sustains markets for farmers, rural grocers, and food manufacturers.⁵ In Illinois, SNAP is responsible for over 11,500 grocery industry jobs and nearly \$1 billion in total wages across supporting sectors such as agriculture, manufacturing, and transportation.⁶ Coupled with the more than \$1 billion in cuts to local food purchasing programs earlier this year, restricting access to SNAP will have ripple effects through the entire domestic supply chain, from the field to the checkout line.⁷

We are also deeply concerned with the cost and feasibility of implementing these changes under the current timeline. The Food Research & Action Center (FRAC) estimates states need 12 to 18 months to adjust their systems, train staff, and ensure accurate eligibility determinations.⁸ In Illinois, the Department of Human Services projects the state will need to hire more than 250 full-time equivalent employees to respond to changes made by the OBBB, costing over \$20 million annually. Additionally, the state will need to update its technology systems to reflect the new eligibility criteria. This includes integrating with federal verification databases and integrity rules, further increasing administrative workload, processing times, and associated costs.⁹

Expecting states to overhaul their SNAP systems in a matter of weeks, absent sufficient guidance and while facing an impending 25 percent cut to administrative funding, places an unrealistic burden on state agencies and the families they serve. The immediate result will likely be delays, confusion, and preventable loss of benefits for eligible individuals at a time when budgets are already stretched thin due to rising costs.

This unrealistic timeline and lack of guidance will also have long-term consequences for states because of the OBBB's unprecedented change to SNAP funding, which will require states to pay a portion of food benefit costs for the first time based on their SNAP payment error rate. While states are working diligently to improve payment accuracy, USDA did not release guidance on the OBBB's complex changes to SNAP policy until 91 days into the 120-day grace period. Once this grace period ends, states will be held responsible for SNAP payment errors, resulting in higher state cost-share payments in fiscal year 2028 and beyond. The rushed changes now being made to meet this unrealistic timeline will have long-term consequences for states and could further jeopardize access to critical food assistance for those who need it most.

We urge USDA to provide maximum flexibility in implementation and quality control treatment of these changes and to issue timely, detailed guidance and robust technical assistance on the OBBB provisions that impact SNAP. At minimum, USDA should allow Illinois and similarly situated states to retain their approved waivers of the time limit until their scheduled expiration dates instead of abruptly terminating these waivers on November 2 with minimal notice. Illinois and other states need sufficient time to adapt systems, train staff, and ensure that eligible individuals do not lose critical food assistance due to rushed or unclear federal requirements—especially during a federal government shutdown, when administrative capacity and resources are already severely constrained.

⁵ Illinois Corn Growers Association, *From Cornfields to Capitol: How SNAP Supports Farmers and Consumers*, 2025. <https://www.ilcorn.org/from-cornfields-to-capitol-how-snap-supports-farmers-and-consumers>

⁶ National Grocers Association, *Economic Impact Study: Sales Impact Analysis and SNAP Impact Study – Illinois Findings*, 2021. <https://grocers.guerrillaeconomics.net/reports/1cbb29cf-1b0f-40c4-8e4c-8b4f1add52b4>

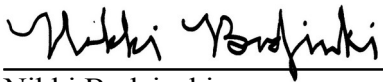
⁷ Politico, *USDA cancels \$1B in local food purchasing for schools, food banks*, 2025. <https://www.politico.com/news/2025/03/10/usda-cancels-local-food-purchasing-for-schools-food-banks-00222796>

⁸ Food Research & Action Center (FRAC), *Q&A: How Does the New SNAP Time Limits Policy Affect You? What States and Families Need to Know*, 2025. <https://frac.org/blog/qa-how-does-the-new-snap-time-limits-policy-affect-you-what-states-and-families-need-to-know>

⁹ Illinois Department of Human Services, *SNAP: HHS Trump Budget Bill Briefing Deck*, August 1, 2025. Available at: [https://www.dhs.state.il.us/OneNetLibrary/27897/documents/SNAP/HHS%20Trump%20Budget%20Bill%20Briefing%20Deck_08012025_A11Y%20\(1\).pdf](https://www.dhs.state.il.us/OneNetLibrary/27897/documents/SNAP/HHS%20Trump%20Budget%20Bill%20Briefing%20Deck_08012025_A11Y%20(1).pdf)

SNAP has long been one of our nation's most effective anti-poverty and pro-farm programs. Undermining its reach will harm families, farmers, and local economies alike. We ask USDA to work collaboratively with states and Congress to ensure these changes do not recklessly jeopardize food access for hundreds of thousands of Americans.

Sincerely,



Nikki Budzinski
Member of Congress



Mike Quigley
Member of Congress



Jesús G. "Chuy" García
Member of Congress



Lauren Underwood
Member of Congress



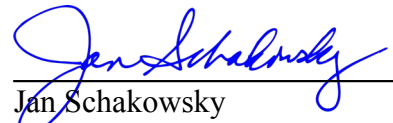
Delia C. Ramirez
Member of Congress



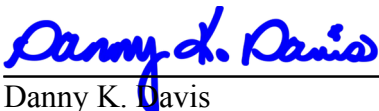
Robin L. Kelly
Member of Congress



Bradley Scott Schneider
Member of Congress



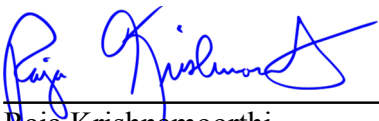
Jan Schakowsky
Member of Congress



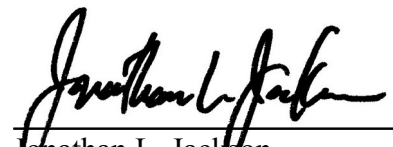
Danny K. Davis
Member of Congress



Bill Foster
Member of Congress



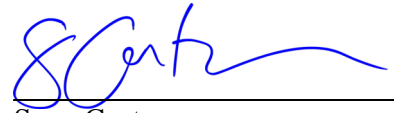
Raja Krishnamoorthi
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Sean Casten
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