



JB Pritzker, Governor

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DATE: April 29, 2026

MEMORANDUM

TO: The Honorable Don Harmon, Senate President
The Honorable John F. Curran, Senate Minority Leader
The Honorable Emanuel "Chris" Welch, Speaker of the House
The Honorable Tony McCombie, House Minority Leader

FROM: Dulce Quintero
Secretary
Illinois Department of Human Services
Dulce M. Quintero
by [Signature]

SUBJECT: **Illinois Commission to End Hunger 2025 Report**

The Illinois Department of Human Services respectfully submits the Illinois Commission to End Hunger 2025 Report on behalf of the Illinois Commission to End Hunger in order to fulfill the requirements set forth in 20 ILCS 5015.

If you have any questions or comments, please contact Barbara Hobrock, Director of External Engagement at Barbara.hobrock@illinois.gov.

cc: The Honorable JB Pritzker, Governor
John W. Hollman, Clerk of the House
Tim Anderson, Secretary of the Illinois Senate
Legislative Research Unit
State Government Report Center



APRIL 2026

2025 YEAR IN REVIEW

ILLINOIS HUNGER LANDSCAPE AND SNAP CHANGES

Every day, too many Americans and their families go to bed not knowing where their next meal is coming from without consistent access to the food they need to sustain themselves. In 2024, approximately 26.1% (more than a quarter) of Americans faced food insecurity.¹ The state of hunger in Illinois is similarly dire. In 2024, it is estimated that more than 25.3% of individuals (3.1 million total) across Illinois faced food insecurity.² Of those facing hunger in Illinois, 1 in 6 are children.³ While no

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one should go without having enough food, hunger has a particularly devastating impact on children – potentially affecting their health, development, academic performance, and well-being.⁴ Mitigating the harmful impacts of growing food insecurity takes dedicated resources. According to Feeding America, it would take an additional \$1.2 billion per year to meet the nutritional needs of people facing hunger in Illinois.⁵ The Supplemental Nutrition Assistance Program (SNAP) is the most vital tool we have to help fill this need, providing access to lifesaving food assistance benefits while supporting local jobs and communities across Illinois.

SNAP is our nation's most effective defense against hunger. The program provides monthly benefits to eligible low-income households to help them purchase groceries. SNAP provides assistance to nearly 42 million Americans across our nation. In Illinois, the program supports almost 2 million residents, including 650,000 children, in meeting their basic nutritional needs. Many of those relying on SNAP are children, older adults, and individuals living with disabilities. As a vital lifeline for food-insecure households, on average, SNAP lifted 229,000 people above the poverty line in Illinois, including 119,000 children, per year between 2015 and 2019.⁶

However, this powerful tool against hunger was significantly cut by recent federal legislation, threatening a severe hunger crisis. [H.R. 1](#), titled the “One Big Beautiful Bill Act,” was signed into law on July 4, 2025. The bill made the largest cut to SNAP in the program's history, reducing funding by almost \$200 billion, and removing millions of people from access to food assistance.

H.R. 1 places additional burdens on food-insecure families relying on SNAP to meet their most basic needs, and increases costs for states to operate and administer the program. Specifically, H.R. 1 makes the following changes:

- For the first time in the over 60 year history of SNAP, requires states to pay a portion of SNAP benefits that have historically been 100% federally funded
- Cuts federal funding for SNAP administrative costs in half
- Expands ineffective work requirements (time-limited SNAP benefits)
- Bars SNAP eligibility for many lawfully present humanitarian immigrants
- Narrows state options to calculate utility deductions – reducing benefits
- Cuts SNAP by preventing future, and likely necessary updates to benefit amounts to keep pace with rising food costs
- Eliminates SNAP Nutrition Education, which helps families make healthier choices

Inreased Cost to States

H.R. 1 increases the amount the state is required to pay in order to both operate and administer SNAP. Prior to H.R. 1, the federal government and state agencies each shared 50% of administrative costs. Under the new law, states are required to pay 75% of administrative costs beginning in federal

Fiscal Year 2027 (October 1, 2026). Starting in federal Fiscal Year 2028 (October 1, 2027), states will also be required to pay a portion of SNAP benefits. Previously, the federal government paid 100% of SNAP benefits. Now, states must pay as much as 15% of the cost of benefits depending on their payment error rate (PER) – a measure of over- and underpayments that largely reflects unintentional clerical and participant mistakes.⁷ Under the new SNAP rules:

- If a state has a PER of less than 6%, there is no state matching requirement
- States with a PER between 6% and less than 8% must pay 5% of benefit costs
- States with a PER between 8% and less than 10% must pay 10% of benefit costs
- States with a PER of 10% or greater must pay 15% of benefit costs
- States with a PER over 13.33% may delay the cost shift for up to 2 years

Illinois' payment error rate for federal Fiscal Year 2024 was 11.56%.⁸ At this rate, the state would need to pay 15% of benefit costs. The Illinois Department of Human Services (IDHS) estimates that Illinois' current, projected state match would cost an additional \$705 million annually based on the current \$4.7 billion in SNAP benefits issued in federal Fiscal Year 2025.⁹ Combined with the increased administrative and personnel costs, IDHS estimates the state would need to pay up to \$800 million per year to keep the SNAP program available for those who need it. If the state does not pay its required portion of the costs, Illinois will lose the program altogether.

Time Limited Benefits & Expansion of Work Requirement

In 1996, Congress established a more stringent work requirement and the associated 3-month time limit in the Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA), know colloquially as “welfare reform.” Under SNAP program rules in place before H.R. 1, nonexempt able-bodied adults without dependents (“ABAWDs” or “time-limited adults”) between the ages of 18 and 54 must work, or engage in other qualifying activities for 80 hours a month. Unless individuals qualified for an exemption, failure to meet the work requirement meant that those individuals could only receive 3-months of SNAP benefits in a fixed 3-year period (the SNAP “time-limit”) unless otherwise exempt or meeting the work requirement. In order to meet the 80 hours per month work requirement, time-limited adults could work or engage in unpaid work for 80 hours per month; participate in a qualifying federal, state, or local approved work program including, but not limited to SNAP Employment and Training (E&T) program; conduct self-initiated community service or volunteer work with a community-based organization; or a combination of any of the aforementioned options, as long as total activity amounted to 80 hours per month.¹⁰

H.R. 1 expanded this work requirement and associated time-limit, applying it to more SNAP households and limiting states' abilities to mitigate its impact. Historically, the 3-month time limit has never applied to parents, other caretakers of children, or to adults over age 54. Through H.R. 1,

Congress expanded the work requirement to include adults ages 55-64 and eliminated exemptions for veterans, former foster youth, and people experiencing homelessness. Further, parents and caregivers of dependents aged 14 and older must also comply with the work requirements or face losing benefits. IDHS estimates that the changes to who is considered an ABAWD increases the population from 190,000 to approximately 450,000 (or nearly 25% of the Illinois SNAP caseload).¹¹ By imposing work requirements on this entire increased population, more than 340,000 individuals were put at risk of losing critical access to food assistance.

H.R. 1 also significantly reduced states' ability to waive the work requirement in places that do not have sufficient jobs. Since the passage of PRWORA in 1996, states have maintained the option to seek a waiver of the work requirement if they meet certain criteria. Among the factors that would make waivers readily approvable by the federal government was if an area of the state had persistently high unemployment rates (i.e. 24-month average unemployment rate that was 20% higher than the national average unemployment rate).¹² Under this provision, Illinois has received a statewide waiver of the work requirement since 2009 (with the exception of DuPage County which, due to low unemployment rates, had to implement the work requirement in 2018 and 2019). H.R. 1 restricts states' ability to obtain waivers of the work requirement in the future, by making only those areas of the state with unemployment rates over 10% eligible for a waiver.

Illinois' current statewide waiver of the work requirement expired on January 31, 2026, meaning that February 2026 will be the first of three countable months for some of the nearly 450,000 people in the state now subject to the requirement. As such, Illinois will likely begin seeing substantial benefits loss as soon as May 2026, after some households have used all three of their countable months in February, March, and April.

Removal of Eligibility for Many Lawfully Present Immigrants

Prior to enactment of H.R. 1, some immigrants who were lawfully present in the United States, including refugees, asylees, victims of human trafficking, and victims of domestic violence, had long been eligible to participate in SNAP. H.R. 1 removes eligibility for these lawfully present groups. Undocumented immigrants have never been eligible for SNAP. The law now limits non-citizen SNAP eligibility to Lawful Permanent Residents (green card holders), certain Cuban and Haitian entrants, and individuals residing in the country under a Compact of Free Association (COFA). The five-year bar on receipt of SNAP for green card holders remains in place, however, despite some confusion based on the initial federal guidance, H.R. 1 did not make any changes to the populations that were exempt from the 5-year bar.¹³ The elimination of eligibility for lawfully present humanitarian immigrants is a stark departure from the United States' long standing bipartisan commitment to supporting humanitarian immigrants, particularly those fleeing violence and persecution. IDHS estimates that up to 16,000 lawfully present immigrants will lose access to SNAP under the new federal law.¹⁴

State Options to Calculate Utility Deductions

H.R. 1 significantly limits state options to calculate utility deductions for SNAP households. The bill prohibits states from including internet costs in the Standard Utility Allowance (SUA). This change makes it harder for many low-income households to qualify for utility-related deductions, and reduces the value of the deduction for households who do receive it – ultimately reducing SNAP benefit amounts. Receipt of a Low-Income Home Energy Assistance Program (LIHEAP) fuel assistance payment no longer automatically qualifies household for a SUA deduction; only older adults and individuals with disabilities can automatically claim the full SUA if they are receiving assistance through LIHEAP.

Preventing Future Updates to Benefit Amounts

The Thrifty Food Plan (TFP) is a formula designed by USDA that estimates the weekly cost of an adequate diet to meet nutritional needs at minimal expense. SNAP benefit allotments are based on the TFP. The 2018 Farm Bill directed USDA to update the TFP every 5 years to bring it up to date with food prices and inflation, as well as nutritional standards and the cost of nutritious foods. Before the reevaluation of the TFP that was finalized in 2021, the formula had not been meaningfully updated since 1975 and was not keeping pace with rising food costs. After the 2021 reevaluation, SNAP households saw a modest increase in benefits to better reflect the cost of an adequate diet. However, H.R. 1 restricts future updates to the TFP by requiring that all future revisions be cost-neutral.

The 2021 update, mandated by the 2018 Farm Bill, had resulted in a 21% increase in monthly SNAP benefits and lifted 2.9 million people in the U.S. and 118,000 people in Illinois out of poverty.¹⁵ Freezing future updates at “cost-neutral” levels undermines this progress and prevents benefits from reflecting dietary guidance and the actual cost of food.¹⁶

Elimination of SNAP Nutrition Education

H.R. 1 eliminates funding for the SNAP Nutrition Education and Obesity Prevention Program (SNAP-Ed), the nutrition promotion arm of SNAP. SNAP-Ed helps participants stretch their food dollars through initiatives like cooking classes, nutrition education on healthy food choices, and engage in efforts to improve community policies and environments to make healthy choices easier. The program helps address diet-related chronic diseases like obesity and high blood pressure. In Fiscal Year 2025, Illinois’ SNAP-Ed allocation was \$19.8 million.¹⁷ In Illinois, SNAP-Ed is provided by University of Illinois Extension and University of Illinois Chicago – Chicago Partnership for Health Promotion as Eat.Move.Save. SNAP-Ed helps Illinois families improve their food and activity choices. The elimination of the program means 1,800 Illinois organizations lose access to SNAP-Ed funded services.¹⁸

IMPACTS ON HUNGER

Hunger knows no bounds. Neighbors in every county and community across Illinois face hunger and food insecurity, lacking access to sufficient food and the nutrients they need. In Illinois, around 1 in 4 (3.1 million) people face hunger, and of them, 1 in 6 (419,180) are children.¹⁹

In Illinois and around the country, food pantries are seeing greater demand than before the COVID-19 pandemic.²⁰ For example, the Greater Chicago Food Depository - the food bank that serves Cook County - is already dealing with historic demand. Based on the number of household visits to the Food Depository's network of more than 850 community food access sites and programs, the network has served over 750,000 household visits from July to October 2025. This represents 52% more household visits compared to July to October 2019, before the COVID-19 pandemic, and 14% more household visits than in July to October 2020 during the first intense year of the COVID-19 pandemic. As inflation rates have risen and grocery prices increase as a result, it is evident that families are in need of far greater help than before.

While the emergency food system plays a critical role in filling the hunger gap, food banks and their partners cannot adequately alleviate hunger. For every one meal provided by food banks, SNAP provides nine.²¹ It is important to remember that this level of need is the current baseline of hunger, before the SNAP benefits reduction that will be caused by H.R. 1. **Given the power of SNAP in addressing hunger, H.R. 1's SNAP cuts threaten to cause the worst hunger crisis Illinois has ever confronted.** The recent shutdown of the federal government offers an illustration of what happens when SNAP is disrupted.

The federal government was shut down from October 1, 2025 to November 12, 2025. This 43-day shutdown was the longest in history and caused disruption of SNAP benefits in November as the U.S. Department of Agriculture's Food and Nutrition Service (FNS) failed to make funding available for SNAP. Households whose issuance dates are earlier in the month had their November benefits delayed. Even this short disruption of SNAP caused food banks across Illinois to experience a rise in need:

- Northern Illinois Food Bank (NIFB) served approximately 5,000 additional neighbors per day in November across its network of partner pantries and programs. NIFB's pantries saw an 18% increase in household visits, and a 27% increase in access to program services. To serve the heightened need, NIFB increased the amount of food going out to pantries, added mobile and pop-up markets, made available additional My Pantry Express orders, and expanded its distribution schedule at the Neighborhood Market in Rockford. October and November 2025 were the highest meal distribution months of NIFB's fiscal year, delivering 8.4 million meals in October, and just over 8.2 million meals in November. Additionally, NIFB found that online searches through its Food Finder tool were up 265% in November compared to its January 1-September 30 average.

- Eastern Illinois Food Bank saw an increase of over 29% in household visits to food pantry partners and mobile food distributions during the government shutdown. Mobile food distributions were created to respond to the need in rural counties by providing emergency food boxes to households. During this time, pantries across Eastern Illinois Food Bank's 21-county service area saw a 23% increase in new households seeking emergency food.
- River Bend Food Bank experienced a 35% increase in household visits across its network of Hunger Relief Partners throughout 15 counties in Western Illinois and 8 counties in Eastern Iowa during the government shutdown. Around 10% of these households were visiting a food pantry for the first time.
- The Greater Chicago Food Depository saw an increase of over 21% in household visits to pantry partners and emergency food hubs which were created to respond to the shutdown by providing food box disruptions. Almost 250,000 Cook County households were served by these emergency food access points over just a few weeks. Pantries in Cook County saw a 53% increase in new households seeking emergency food, while a total of 34% of households served by emergency food hub distributions were accessing the emergency food system for the first time.

A temporary disruption of SNAP caused a substantial surge in need, but H.R. 1 could make loss of SNAP a longer-term reality for hundreds of thousands of households in Illinois, and threatens the continued operation of the program altogether.

The impacts of SNAP cuts emanate beyond households and the emergency food system, threatening education, healthcare, and the state economy. Consistent access to quality, nutritious food is critical for children's development and provides the building blocks for growing healthy minds and bodies to help them perform well in school. Adequate food also means increasing public health and substantial downstream healthcare cost savings. One recent study by Tufts University's Friedman School of Nutrition found that food as medicine interventions – medically tailored meals to help patients address underlying health issues - can save millions of dollars in health care costs, even after accounting for the costs of care, and avert 3.5 million hospitalizations annually. The intervention was estimated to achieve cost savings ranging from \$732 to \$6,299 per patient in one year.²²

In addition to significant impacts on health and hunger, cuts to SNAP harm our local economy and the jobs our families, neighbors, and communities rely on. Feeding America estimates that in Illinois, every dollar spent using SNAP benefits generates about \$1.70 in economic activity. This translates to \$4,469,341,818 distributed through SNAP in FFY 24 generating \$7,597,881,091 in economic activity. According to the National Grocers Association, SNAP in Illinois supports more than 11,584 grocery industry jobs, generates more than \$476 million in grocery industry wages, and drives a total output of \$1.3 billion across grocery and other retailing industries across the state. The output generated by supplier and indirect impacts of the program represents another \$1.5 billion.²⁴ Loss of redeemed SNAP benefits means less money spent at grocery stores, fewer jobs, and less food produced.

NEXT STEPS AND ACTION ITEMS

The Illinois Commission to End Hunger is guided by the belief that no one in Illinois should ever face hunger. As communities brace for greater need, the Commission needs to calibrate its work in new ways to support our neighbors who are already facing difficult decisions – between putting food on the table, paying medical bills, clothing their children for the winter months, or keeping a roof over their heads. Ending hunger requires collaborative action across all facets of our communities. State agencies, community-based organizations, and advocates all have a role to play in this effort.

The Commission, with feedback from state partners, lays forth the following action items as stakeholders seek opportunities to improve program access and delivery as the federal changes to SNAP are implemented.

1. Implement the Governor’s Executive Order on Food Insecurity

On October 30, 2025, Governor Pritzker issued “Executive Order to Address Food Insecurity and Food Access in Illinois.” The Executive Order charges IDHS to work closely with the Commission to launch statewide listening sessions to understand the impact of SNAP cuts on individuals and businesses. This outreach will culminate in a detailed report sharing the information gathered from across the state and provide recommendations to mitigate the harm Illinoisans are experiencing.

To this end, the Commission has proceeded by convening community partners to provide them with up-to-date and accurate information. The first phase of this work has involved hosting a series of webinars each month – from November to February – designed for individuals and organizations that support Illinoisans enrolling in and navigating the SNAP program. The webinars have served as hubs for information sharing and communication of best practices between partners, empowering them to engage in their work of educating and providing direct services to our communities. Ultimately, this work will be critical in crafting targeted actions the state can take to address the impact of H.R. 1 while keeping the public aware of the evolving landscape around SNAP benefits.

2. Prepare to respond to new state financial obligations

Even with federal changes to SNAP, the program remains a vital support for nearly 2 million residents across Illinois. For this reason, the Commission, agency leaders, members of the General Assembly, and community partners should work together to prepare Illinois to respond to any future SNAP benefits cost-share. Managing this new financial obligation will be necessary to avoid the elimination of SNAP – an outcome that would threaten food security, health, and economic stability in Illinois. The Commission stands ready to support and advise state leaders making key preparations to preserve SNAP.

3. Engage community partners to educate and assist SNAP recipients navigate H.R. 1 provisions

It takes a community to address hunger. Cultivating and mobilizing an informed and engaged network of community partners is key to ensuring accurate information on SNAP changes reaches every corner of our communities. IDHS has been developing SNAP Connect, a comprehensive statewide initiative to expand the state's current SNAP outreach efforts to reach more individuals throughout the state, with a special focus on those impacted by upcoming SNAP policy changes, and to fill geographic and population gaps where no SNAP outreach activities are currently conducted. Launching and expanding this initiative would enable more targeted outreach to SNAP recipients impacted by federal changes by both IDHS and community partners.

4. Develop strategies to support those who lose SNAP

While the new costs of administering the SNAP program are substantial, the state also faces historic SNAP benefits loss before these new financial obligations take effect. Hundreds of thousands of Illinoisans are likely to lose SNAP benefits in 2026 due to the eligibility restrictions for lawfully present immigrants, and the expanded SNAP work requirement. Without this critical lifeline, the Commission should identify new or additional supports for those who lose access to SNAP.

5. Leverage state flexibility to administer SNAP cuts with compassion and preservation of access

As the state designs and implements its policies in accordance with the new federal law, it is important to continue prioritizing access to SNAP for our neighbors who rely on food assistance while promoting program accuracy. In addition to launching the SNAP Connect program, as described above, participant-facing materials and notices should use plain language, be accessible, and facilitate understanding of the changes and their impact.

6. Streamline implementation of SNAP and Medicaid work requirements

H.R. 1 expands the work requirement for SNAP beneficiaries and additionally enacts new requirements for Medicaid recipients receiving coverage via the Affordable Care Act Expansion. While the requirements differ between programs, states have latitude in implementing them. Further, a SNAP ABAWD who meets the SNAP work requirement also satisfies the requirement for Medicaid. Given the number of Illinoisans who are on both SNAP and Medicaid, state agencies should align work requirement policies to the greatest extent possible to minimize confusion for benefit recipients.

CONCLUSION

The mission to end hunger is a shared one. The Illinois Commission to End Hunger is dedicated to working with partners across the state in our shared goal of ensuring that every person in Illinois has access to the food they need to thrive. The stakes have never been higher for the people in the state who are already struggling to meet their basic needs. To respond to these unprecedented cuts to the safety net in H.R. 1, an array of stakeholders in Illinois must rise to meet the challenges ahead and ensure Illinoisans have the food they need.

For more information about our work, please visit www.endhungerillinois.org.

For the latest information regarding Federal changes to SNAP, please visit the Illinois Department of Human Services [SNAP Federal Impact Center](#).



ENDNOTES

¹ Bureau, US Census. 2025. "POV-01. Age and Sex of All People, Family Members, and Unrelated Individuals." Census.gov. September 9, 2025. <https://www.census.gov/data/tables/time-series/demo/income-poverty/cps-pov/pov-01.html#below200>. Source: 2024 American Community Survey 1-year estimates table POV-01, Poverty Status in 2024. Food insecurity estimates are based on incomes below 200% of the Federal Poverty Level and the cost of living.

² States, United. 2025. "Explore Census Data." Census.gov. 2025. <https://data.census.gov/table?q=S1701:+Poverty+Status+in+the+Past+12+Months&g=040XX00US17>. Source: 2024 American Community Survey 1-year estimates. Food insecurity estimates are based on income levels below 200% of the Federal Poverty Level and below the cost of living.

³ "Illinois | Feeding America." 2019. Feedingamerica.org. 2019. <https://www.feedingamerica.org/hunger-in-america/illinois>.

⁴ Feeding America. 2022. "Facts about Child Hunger in America." Feedingamerica.org. 2022. <https://www.feedingamerica.org/hunger-in-america/child-hunger-facts>.

⁵ Id. "Illinois | Feeding America." 2019. Feedingamerica.org. 2019. <https://www.feedingamerica.org/hunger-in-america/illinois>.

⁶ Center on Budget and Policy Priorities, Supplemental Nutrition Assistance Program in Illinois (Washington, DC: Center on Budget and Policy Priorities, 2024), https://www.cbpp.org/sites/default/files/atoms/files/snap_factsheet_illinois.pdf.

⁷ Center on Budget and Policy Priorities, "SNAP Includes Extensive Payment Accuracy System," Center on Budget and Policy Priorities, accessed November 24, 2025, <https://www.cbpp.org/research/food-assistance/snap-includes-extensive-payment-accuracy-system>.

⁸ 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, <https://fnsprod.azureedge.us/sites/default/files/resource-files/snap-fy24QC-PER.pdf>.

⁹ 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. This aligns with previous external analyses shared that suggested Illinois would need to pay \$666 million/year at the 15% rate. See: CBPP, "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>.

¹⁰ Illinois Department of Human Services, “Work and Training Requirements,” Illinois Department of Human Services, accessed November 24, 2025, <https://www.dhs.state.il.us/page.aspx?item=175082>[https://www.dhs.state.il.us/page.aspx?item=175082#:~:text=Work%20\(paid%20or%20unpaid\)%20an,%2C%20Community%20Workfare%2C%20Earnfare;%20or](https://www.dhs.state.il.us/page.aspx?item=175082#:~:text=Work%20(paid%20or%20unpaid)%20an,%2C%20Community%20Workfare%2C%20Earnfare;%20or).

¹¹ 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.

¹² 7 CFR 273.24(f) (2025).

¹³ However, once certain humanitarian immigrants become LPRs, they may be exempt from the 5-year waiting period for SNAP and Medicaid. As affirmed in FNS guidance issued in December 2025, H.R. 1 did not change the exceptions to the 5-year waiting period established under PRWOWA. See. 8 USC 1613. See also. <https://www.fns.usda.gov/snap/obbb-alien-eligibility-qas1>. FNS has historically recognized this in its regulations and guidance, and H.R. 1 did not change these provisions. See. 8 USC 1612(a)(2). Federal law provides that the PRWORA restriction on access to SNAP/SSI (which are the “specified Federal programs”) does not apply during the 7 year period after a person is granted one of the humanitarian statuses. (Note that LPRs would continue to be eligible after the 7- year period, b/c they have been in “qualified” status for at least 5 years, under 8 USC 1612(a)(2)(L)). Thus, because of the relationship between these two provisions in federal statute, the five year bar does not apply to many humanitarian statuses set forth as exempt in PRWORA.

¹⁴ Beginning April 1, 2026, immigrants applying for SNAP who are in one of the newly ineligible immigration statuses, will be denied. For active SNAP households containing members who are no longer eligible for SNAP due to these immigrant eligibility restrictions, their eligibility will be reevaluated by IDHS at their next SNAP redetermination, and those members will be removed from the case at that time. As such, up to 16,000 humanitarian immigrants on SNAP in Illinois will roll off the program over the course of the next year based on their households redetermination date. (Note: Only those members with immigration statuses that are no longer eligible will be removed from the household, and SNAP eligibility and benefit amount for the remaining household members will be adjusted based on the reduced SNAP household size).

¹⁵ Laura Wheaton, Updated SNAP Benefits Decreased Poverty in Every State, Urban Institute, April 2025, https://www.urban.org/sites/default/files/2025-04/Updated_SNAP_Benefits_Decreased_Poverty_in_Every_State_The_Effect_of_the_2021_Thrifty_Food_Plan_Reevaluation.pdf

¹⁶ Food Research & Action Center, Impact of H.R. 1 on Thrifty Food Plan (Washington, DC: Food Research & Action Center, 2023), <https://frac.org/wp-content/uploads/Impact-of-H.R.1-on-Thrifty-Food-Plan-Fact-Sheet.pdf>.

¹⁷ 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.

¹⁸ University of Illinois System, “Support SNAP-Ed” Campaign, June 2025, <https://uillinois.quorum.us/campaign/126706/>.

¹⁹ Feeding America, "Illinois," accessed November 22, 2025, <https://www.feedingamerica.org/hunger-in-america/illinois>.

²⁰ Illinois Policy Institute, "Nearly 2M Illinoisans Still Need Federal Food Benefits, Most in Chicago," July 18, 2025, <https://www.illinoispolicy.org/nearly-2m-illinoisans-still-need-federal-food-benefits-most-in-chicago/>.

²¹ Claire Babineaux-Fontenot, "Feeding America Statement on the Lapse of SNAP Funding," Feeding America, accessed November 24, 2025, <https://www.feedingamerica.org/about-us/press-room/feeding-america-SNAP-lapse>.

²² Food is Medicine Coalition, "New Study Finds Medically Tailored Meals Are Cost-Saving Across the U.S.," April 7, 2025, https://fimcoalition.org/news_and_events/new-study-finds-medically-tailored-meals-are-cost-saving-across-the-u-s/.

²³ Numbers updated to reflect the most recent full year (FFY24) of SNAP distribution in IL. Id. Feeding America, "Illinois," accessed November 22, 2025, <https://www.feedingamerica.org/hunger-in-america/illinois>.

²⁴ National Grocers Association, "Illinois SNAP Economic Impact Report," accessed November 22, 2025, <https://grocers.guerrillaeconomics.net/reports/4b858239-51f1-40f4-bbc3-8bd670d35cc2>.



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