**The Erosion and Reconstruction of the US Social Safety Net: A Deep Analysis of SNAP ABAWD Policy Evolution Across 50 States (2010-2025)** 1

**Executive Summary** 2

Over the past fifteen years, the Supplemental Nutrition Assistance Program (SNAP), the first line of defense against hunger in the United States, has undergone a profound and turbulent transformation. 3The core focus of this transformation has been the work requirements and time limits for "Able-Bodied Adults Without Dependents" (ABAWD). 4From the widespread waivers under the *American Recovery and Reinvestment Act* (ARRA) in 2010 to the extreme tightening under the implementation of the *One Big Beautiful Bill Act* (OBBBA) in 2025, ABAWD policy has evolved from a regulatory mechanism fluctuating with economic cycles into a highly exclusive labor activation tool. 5

Based on exhaustive federal legislative records, state-level administrative data, court documents, and economic statistics, this report conducts a comprehensive review and analysis of the evolution of SNAP ABAWD policies across all 50 states from 2010 to 2025. 6The study finds that the policy trajectory during this period shows a significant trend of "de-waiverization": the federal government gradually stripped state governments of the power to apply for waivers based on local economic realities, tightening the waiver threshold from "labor surplus" to a hard indicator of "unemployment rate exceeding 10%," which is extremely difficult to reach. 7Meanwhile, the age limit for the population subject to work requirements was radically raised from 49 to 64, fundamentally changing the demographic characteristics of the affected group and bringing a large number of quasi-elderly individuals facing re-employment difficulties into the range of punitive mechanisms. 8

Furthermore, this report deeply analyzes the fierce game between federal mandates and state autonomy. 9Between 2013 and 2016, Republican states represented by Kansas and Maine took the lead in voluntarily giving up waivers, using this as an ideological testing ground; whereas between 2019 and 2025, Democratic states represented by California and Illinois attempted to preserve the last safety net for vulnerable groups amidst the tide of federal tightening through legal litigation and administrative means. 10The federal government shutdown in 2025 and the subsequent storm of litigation exposed these cracks under the federal system. 11

**Part I: The Cornerstone of ABAWD Policy and the Post-Recession Buffer Period (2010-2013)** 12

**1.1 Institutional Origin: PRWORA and the Legal Framework of the Three-Month Limit** 13

To understand the evolution of SNAP policy from 2010 to 2025, one must trace back to the legal framework established by the *Personal Responsibility and Work Opportunity Reconciliation Act* (PRWORA) of 1996. 14This act introduced strict time limits for the ABAWD population at the federal level for the first time. 15According to Section 6(o) of the *Food and Nutrition Act*, able-bodied adults aged 18 to 49 who are not pregnant and have no minor children in the household are limited to receiving SNAP benefits for 3 months within a 36-month period unless they meet the requirement of at least 80 hours of work, vocational training, or volunteer service per month. 16

However, lawmakers acknowledged regional differences in labor markets when designing this mechanism, thus leaving two crucial relief valves: 17

* **Geographic Waivers:** Allows state governments to apply to the U.S. Department of Agriculture (USDA) to suspend the implementation of time limits in areas where the unemployment rate exceeds 10% or there is a "lack of sufficient jobs." 18
* **15% Discretionary Exemptions:** Allows state governments to receive a batch of exemption slots annually based on 15% of the number of ineligible ABAWDs, used for specific individual case handling, and unused slots can be carried over indefinitely. 19

Before 2010, these provisions formed the flexible foundation of SNAP policy. 20However, in the following fifteen years, the battle over the interpretation of the definition of "lack of sufficient jobs" became the core battlefield of the game between the federal and state governments. 21

**1.2 The Full Ceasefire of the ARRA Era (2009-2010)** 22

The SNAP policy landscape in 2010 was directly subject to the aftershocks of the 2008 financial crisis. 23Facing the most severe economic recession since World War II, Congress passed the *American Recovery and Reinvestment Act of 2009* (ARRA). 24ARRA not only increased SNAP benefit amounts but, more crucially, included a temporary provision that effectively suspended ABAWD time limits nationwide from April 2009 to September 2010. 25

The logic behind this decision was clear: in an environment where the national unemployment rate soared to around 10%, punishing individuals who could not find work was not only unjust but would also weaken SNAP's macroeconomic function as an automatic stabilizer. 26Therefore, in 2010, almost all 50 states were under some form of waiver protection. 27For administrative managers, this was a rare "ceasefire period" where state agencies did not need to track ABAWD work hours and could focus their energy on processing the surging number of applications. 28

**1.3 The Extended Umbrella: Extended Unemployment Benefit Trigger Mechanism (2011-2013)** 29

Although ARRA's statutory suspension expired in September 2010, the vast majority of states did not immediately resume implementing time limits in the following years. 30This was because the USDA issued guidance allowing any state eligible for federal "Emergency Unemployment Compensation" (EUC) extended benefits to automatically qualify for the SNAP ABAWD waiver standard of "lack of sufficient jobs." 31

In fiscal years 2011 and 2012, due to the extremely slow recovery of the labor market, 46 states as well as Washington D.C., Guam, and the Virgin Islands met this standard, thereby obtaining Statewide Waivers. 32This included states that would later be diametrically opposed in policy stances: California, Texas, Florida, and New York all adopted the same strategy during this period—utilizing the flexibility provided by the federal government to maximize coverage for their state residents. 33

Data from this period shows that the vast majority of ABAWDs nationwide lived in waiver areas. 34This broad coverage masked potential ideological divergences among states because, in an extremely difficult economic environment, even conservative governors found it hard to refuse fully federally funded food assistance entering their state's economic cycle. 35

**Part II: The Great Divergence—Voluntary Resumption and Ideological Experiments (2013-2015)** 36

As overall U.S. economic indicators improved in 2013, the unified waiver front began to disintegrate. 37This disintegration did not stem from mandatory federal legal requirements but from the active choices of some Republican-governed states. 38This stage marked the transformation of SNAP policy from a purely economic relief tool into a testing ground for political ideology. 39

**2.1 Kansas's Radical Experiment (2013)** 40

Kansas Governor Sam Brownback became the vanguard of this "Return to Work" movement. 41Although Kansas was still eligible for a federal waiver in 2013, the state government announced in September 2013 that it would not renew its ABAWD waiver application starting October 1. 42This decision directly impacted approximately 20,000 unemployed adults. 43

The theoretical basis of the Brownback administration was the "welfare trap" hypothesis, believing that the existence of waivers suppressed recipients' willingness to seek jobs. 44Data subsequently released by the Kansas Department for Children and Families (DCF) was widely cited by conservative think tanks like the Foundation for Government Accountability (FGA). 45The FGA report claimed that after restoring work requirements, ABAWD caseloads dropped by 75%, while the income of those leaving the program grew by an average of 127%. 46

However, this narrative was strongly rebutted by anti-hunger organizations. 47They pointed out that the precipitous drop in caseloads did not mean these people found jobs, but that a large number of poor people were purged from the system because they could not meet harsh reporting requirements or find work meeting the 20 hours/week standard. 48The Kansas experiment became a blueprint for other conservative states to follow. 49

**2.2 Oklahoma and Maine Follow Suit (2013-2014)** 50

Following closely after Kansas, Oklahoma allowed its waiver to expire on October 1, 2013, restoring statewide work requirements. 51

More iconic was Maine. 52Under the leadership of Governor Paul LePage, Maine re-implemented work requirements in October 2014. 53Within three months of implementation, ABAWD caseloads in Maine plummeted from 13,332 to 4,540, and dropped below 2,000 a year later. 54The LePage administration viewed this as a major victory in eliminating welfare dependency, even emphasizing in subsequent policy propaganda that this "tough love" pushed people into the labor market. 55However, tracking research by the Maine Center for Economic Policy (MECEP) found that over 60% of those who lost benefits did not find stable work in the following year, but instead fell into deeper poverty and food insecurity. 56

**2.3 Wisconsin's Full Implementation (2014-2015)** 57

Under the governance of Governor Scott Walker, Wisconsin adopted a more systematic approach. 58The state not only restored time limits but also mandated ABAWDs to participate in an employment training program called "FoodShare Employment and Training (FSET)." 59While federal law requires states to provide training slots for those unable to find work to avoid them losing eligibility, the Wisconsin model focused more on making FSET participation the only path to maintaining benefits. 60This model was later termed the "Wisconsin Model" and was viewed by the Trump administration as a potential direction for federal policy reform after the 2016 election. 61

The evolution in this phase revealed a key political dynamic: the enforcement intensity of SNAP policy no longer depended solely on unemployment rates, but on the political leaning of state governments. 62In states with similar economic indicators, the fate of ABAWDs could be diametrically opposite—in Illinois, they were still protected by waivers; while in neighboring Wisconsin, they faced the risk of losing benefits. 63

**Part III: The 2016 Cliff and the Rise of "Jigsaw" Waivers (2016-2018)** 64

**3.1 Withdrawal of the Federal Umbrella** 65

2016 is widely considered a turning point for SNAP ABAWD policy. 66As the national unemployment rate continued to decline, the vast majority of states no longer met the conditions to automatically obtain statewide waivers through "extended unemployment benefits." 67According to FNS estimates, as waivers expired successively between January and April 2016, over 500,000 to 1 million ABAWDs nationwide faced the risk of losing benefits. 68

At this time node, three distinct state-level strategies formed across the US: 69

* **The Implementers:** Such as Arkansas, Florida, Missouri, North Carolina. 70These states chose to implement time limits statewide even if parts of the state (such as high-unemployment rural counties) qualified for waivers, refusing to apply for any. 71Florida restored implementation statewide starting January 1, 2016, causing tens of thousands of recipients to be cut off from benefits on April 1 (when the three-month limit ended). 72
* **The Partial Waiver States:** Such as Colorado, Massachusetts, Washington. 73These states used the flexibility allowed by federal regulations to apply for waivers for specific counties or cities. 74This strategy acknowledged the imbalance of economic development within the state, protecting residents in economically backward areas. 75
* **The Maximizers:** Such as California, Illinois, New Mexico. 76These states used complex statistical methods to "group" high-unemployment areas with low-unemployment areas; as long as the average unemployment rate of the combined region was 20% higher than the national average, they could apply for a waiver. 77This strategy allowed these states to preserve waiver rights for a large proportion of the population even amidst overall economic recovery. 78

**3.2 The Controversy of Geographic Grouping** 79

The "geographic grouping" strategy became the focus of controversy between 2016 and 2018. 80Taking California as an example, through carefully designed regional combinations, the state successfully retained waiver eligibility for vast territories including parts of urban centers and extensive agricultural areas. 81Supporters argued this was a reasonable application of the "Labor Market Area" concept in federal regulations, reflecting the reality of workers commuting across counties; opponents (mainly conservative lawmakers and the later Trump administration) argued this was an abuse of rules (gerrymandering), allowing areas with no lack of jobs to obtain waivers, violating the original intent of the legislation. 82

Data from this period showed that although the national unemployment rate had dropped below 5%, about one-third of the US population still lived in SNAP waiver areas. 83This phenomenon directly triggered the subsequent regulatory crackdown by the Trump administration. 84

**Part IV: The Trump Administration's Regulatory Raid and Judicial Block (2019-2020)** 85

**4.1 The Game of the 2018 Farm Bill** 86

In 2018, when Congress was formulating a new round of the *Farm Bill*, House Republicans attempted to write stricter ABAWD work requirements into law, including restricting states' waiver rights. 87However, under strong opposition from Senate Democrats, the finally passed *Agriculture Improvement Act of 2018* did not include these radical provisions, instead retaining the flexibility for states to apply for waivers. 88

**4.2 The 2019 Final Rule: Expansion of Executive Power** 89

After the legislative block, the Trump administration's USDA directly utilized executive power, issuing a proposed rule in February 2019 and a "Final Rule" in December of the same year. 90This rule aimed to fundamentally tighten waiver standards: 91

* **Setting a 6% Unemployment Floor:** Even if a region's unemployment rate was 20% higher than the national average, its absolute unemployment rate must reach 6% to apply for a waiver. 92Against the backdrop of a national unemployment rate of about 3.7% at the time, this floor was extremely high. 93
* **Prohibiting Arbitrary Grouping:** Strictly restricted states' ability to combine different counties, requiring combinations to be based only on federally defined labor market areas. 94
* **Limiting Carryover Slots:** Attempted to cancel the indefinite carryover of the 15% discretionary exemption slots, preventing states from "hoarding" slots. 95

The USDA explicitly stated that this move was to prevent states from "abusing" waiver rights when the economy was strong. 96It was estimated that once implemented, this rule would cause approximately 700,000 people to lose SNAP benefits. 97

**4.3 *District of Columbia v. USDA*: Legal War and Pandemic Intervention** 98

Just on the eve of the new rule's scheduled effective date of April 1, 2020, a coalition of 19 states (including New York, California, Massachusetts, etc.), the District of Columbia, and New York City sued the USDA. 99In the case of *District of Columbia v. USDA*, the plaintiffs accused the USDA's rule of not only violating the *Administrative Procedure Act* (APA) but also blatantly contravening Congress's intent to maintain the status quo in the 2018 *Farm Bill*. 100

On March 13, 2020, just two weeks before the rule was to take effect, Judge Beryl A. Howell of the U.S. District Court for the District of Columbia issued a preliminary injunction blocking the implementation of the section of the rule regarding tightening waiver standards. 101The judge specifically mentioned the approaching COVID-19 pandemic in the ruling, pointing out that depriving people of food assistance during a public health crisis was unimaginable. 102This ruling effectively froze the Trump administration's efforts to reform ABAWD policy, paving the way for subsequent pandemic-era policies. 103

**Part V: Pandemic Freeze and the Welfare Cliff (2020-2023)** 104

**5.1 FFCRA's Comprehensive Suspension** 105

With the outbreak of the COVID-19 pandemic, Congress quickly passed the *Families First Coronavirus Response Act* (FFCRA). 106This act stipulated that during the federal Public Health Emergency (PHE), the three-month time limit for ABAWDs was suspended. 107This meant that from April 1, 2020, all SNAP recipients nationwide, regardless of location or employment status, would not lose benefits due to time limits. 108

Additionally, the introduction of Emergency Allotments (EAs) allowed all households to receive the maximum benefit amount corresponding to their household size (later adjusted to an increase of at least $95). 109This was the period with the most generous benefits and lowest thresholds in SNAP history. 110

**5.2 The 2023 "Welfare Cliff" and the End of the PHE** 111

This loose situation faced a sharp reversal in 2023. 112The *Consolidated Appropriations Act, 2023* decided to terminate Emergency Allotments early, with the last states bidding farewell to EAs issuing the final payments in February 2023. 113At the same time, as the PHE officially ended on May 11, 2023, the FFCRA's suspension of ABAWD time limits also expired. 114

From July 1, 2023, states were forced to restart ABAWD time limit tracking systems. 115For many staff and recipients who joined SNAP during the pandemic, this was not just a return to policy, but a massive administrative shock. 116To mitigate this impact, some states (such as California and Massachusetts) attempted to use state-level funds for a brief transition, but this could not change the basic fact that federal rules had returned to strictness. 117

**Part VI: The Legislative Reversal—From FRA to OBBBA (2023-2025)** 118

Between 2023 and 2025, SNAP policy experienced two major legislative shocks, completely reshaping the definition and waiver mechanisms of ABAWD. 119

**6.1 The *Fiscal Responsibility Act* (FRA) of 2023: Prelude to Age Expansion** 120

In June 2023, as part of the negotiations to raise the debt ceiling, Congress passed the *Fiscal Responsibility Act* (FRA). 121This act made the most significant modifications to ABAWD policy since 1996: 122

* **Gradual Increase of Age Limit:** Gradually raised the age limit for ABAWD regulations from 49 to 54. 123
  + September 1, 2023: Raised to 50. 124
  + October 1, 2023: Raised to 52. 125
  + October 1, 2024: Raised to 54. 126
* **New Exempt Groups:** To balance the impact of raising the age, the FRA exempted veterans, homeless individuals, and former foster youth aged 24 and under. 127
* **Reduction of Discretionary Slots:** Reduced the proportion of annual discretionary waiver slots for states from 12% to 8% and strictly limited the ability to carry over slots. 128

The implementation of the FRA brought huge administrative challenges to states, requiring them to reprogram systems to identify the newly included 50-54 age group while establishing new processes to identify homeless individuals and veterans. 129

**6.2 The *One Big Beautiful Bill Act* (OBBBA) of 2025: Historic Tightening** 130

However, the FRA was merely a prelude. 131On July 4, 2025, President Donald Trump signed the *One Big Beautiful Bill Act* (OBBBA, H.R. 1). 132This bill conducted a "scorched earth" reform of SNAP, unprecedented in its severity. 133

**6.2.1 Age Limit Skyrockets to 64** 134

The most radical provision of the OBBBA was raising the ABAWD age limit in one go to **64 years old**. 135This means a large number of quasi-retirees, a group typically facing severe age discrimination and chronic health issues, must now meet the requirement of 20 hours of work per week to receive food assistance. 136Statistics show a significant proportion of SNAP recipients belong to the 55-64 age group; they often neither meet the strict standards for disability benefits (SSI/SSDI) nor can easily find jobs in the manual labor market. 137

**6.2.2 Abolition of "Lack of Sufficient Jobs" Waiver Standard** 138

The OBBBA fundamentally destroyed the ability of states to apply for geographic waivers. 139The bill deleted the flexible standard of "lack of sufficient jobs," stipulating that unless it is a specific area in Alaska or Hawaii, a region must prove its **unemployment rate exceeds 10%** to obtain a waiver. 140

Against the macro background of the US overall unemployment rate maintaining around 4.0%-4.5% in 2025, the 10% threshold is almost insurmountable. 141This change caused states like Washington and Minnesota, which previously relied on "underemployment" evidence to apply for waivers, to lose all waiver eligibility overnight. 142Even California, which long maintained a statewide waiver, found most of its counties no longer eligible, with only a very few agricultural counties like Imperial County surviving. 143

**6.2.3 "Purge" of Exempt Groups and Introduction of Tribal Exemptions** 144

The OBBBA repealed the exemptions for homeless individuals, veterans, and former foster youth that were established by the FRA just two years prior. 145This legislative "U-turn" caused immense administrative confusion and recipient bewilderment. 146

As a replacement, the OBBBA introduced exemptions for "Indians," "Urban Indians," and "California Indians" (defined under IHCIA). 147This clause aimed to protect indigenous groups with extremely high poverty rates. 148However, its implementation was fraught with challenges, particularly for "Urban Indians" living off-reservation, where state agencies struggled to verify their identity eligibility, leading to new bureaucratic barriers. 149

**6.2.4 Resurgence of the "Junk Food" Ban** 150

The OBBBA also authorized the USDA to approve state applications to restrict SNAP purchases of "junk food" (such as soda and candy). 151By the end of 2025, 12 Republican states, including **Texas, Florida, and Iowa**, had received approval to implement this restriction in 2026. 152This marks a shift in SNAP policy from simple "anti-hunger" to paternalistic management where "behavior is a condition." 153

**Part VII: The 2025 Federal Shutdown Crisis and Interstate Polarization** 154

In October 2025, the federal government fell into a shutdown due to a budget deadlock. 155Unlike in the past, the Trump administration refused to use USDA contingency funds to pay for November SNAP benefits, causing a suspension of benefit issuance. 156This crisis pushed states to the brink of collapse and triggered fierce legal confrontation. 157

**7.1 *California v. USDA*: Judicial Relief** 158

A coalition of 25 states led by the Attorneys General of California, Massachusetts, and New York quickly sued the USDA. 159The plaintiffs argued that the USDA held approximately $6 billion in contingency funds and had a statutory obligation to maintain SNAP benefit issuance, making its refusal to use the funds arbitrary and illegal. 160

In early November 2025, federal judges in Rhode Island and Massachusetts issued Temporary Restraining Orders (TROs), forcing the USDA to release the funds. 161Although this legal victory restored the flow of funds, the delayed appropriation caused serious delays and chaos in benefit issuance. 162

**7.2 State Response Strategies** 163

In this crisis, state reactions showed distinct partisan colors: 164

* **Protective Strategy (Blue States):** California, Vermont, and Massachusetts used state-level reserve funds to advance partial or full benefits before federal funds arrived, ensuring residents did not go without food. 165At the same time, these states maximized the use of the remaining 8% discretionary slots to protect the 60-64-year-old elderly affected by the new OBBBA rules. 166
* **Enforcement Strategy (Red States):** Texas, Florida, and Iowa strictly followed the federal shutdown order and did not use state funds to fill the gap. 167Simultaneously, these states actively prepared to implement OBBBA restrictions, including updating systems to purge recipients who did not meet the new work requirements. 168

**Part VIII: Panorama of ABAWD Policy Status Across 50 States (Fiscal Year 2025)** 169

The table below summarizes the waiver status of each state based on data as of January 1, 2025. 170It is worth noting that since the OBBBA's 10% unemployment threshold went into full effect in the second half of 2025, many states that had partial waivers at the beginning of the year had completely lost waiver eligibility by the end of the year. 171

**Table 1: Overview of SNAP ABAWD Waiver Status by State, FY 2025** 172

| **State** | **FY 2025 Waiver Status** | **Policy Evolution & Notes** |
| --- | --- | --- |
| Alabama | No Waiver | Long-term no waiver since 2016, strictly enforced. |
| Alaska | Partial Waiver | Retained waivers for some rural census areas; benefited from new OBBBA Indigenous exemptions. |
| Arizona | Partial Waiver | Waivers for tribal lands and some high-unemployment counties; significantly protected by Indigenous exemptions. |
| Arkansas | No Waiver | Voluntarily ended waiver in 2016; approved to implement "junk food" ban. |
| California | Statewide Waiver | Approved for statewide waiver from Feb 2025 to Jan 2026 (applied based on old standards pre-OBBBA), one of the last bastions. 173 |
| Colorado | Partial Waiver | Targeted specific counties; actively utilized discretionary slots. |
| Connecticut | Partial Waiver | Targeted labor surplus areas. |
| Delaware | Statewide Waiver | Approved based on recent unemployment spike; used state funds to advance payments during shutdown. 174 |
| District of Columbia | Statewide Waiver | Long-term statewide waiver maintained due to structural unemployment within the District. 175 |
| Florida | No Waiver | Strictly enforced since 2016; actively implementing "junk food" ban in 2025. |
| Georgia | No Waiver | Fully restored work requirements in 2025; pushed age limit to 65 starting November. 176 |
| Hawaii | Partial Waiver | Neighbor islands obtained waivers; OBBBA retained special waiver provision for non-contiguous states (1.5x national unemployment rate). 177 |
| Idaho | No Waiver | Strictly enforced; approved to implement "junk food" ban. |
| Illinois | Statewide Waiver | Waiver valid until Jan 2027 (based on old standards), but faces future threat of OBBBA 10% hard target. 178 |
| Indiana | No Waiver | Strictly enforced; approved to implement "junk food" ban. |
| Iowa | No Waiver | Restricted SNAP purchase scope via state legislation; no waiver. |
| Kansas | No Waiver | Pioneer in voluntarily abandoning waivers in 2013. |
| Kentucky | Partial Waiver | Limited to eastern coal-producing counties. |
| Louisiana | No Waiver | Partial waiver expired Oct 2024; new state law restricts future waiver applications; implementing "junk food" ban. 179 |
| Maine | Partial Waiver | Mills administration reversed LePage era's total restrictions, seeking rural waivers. |
| Maryland | Partial Waiver | Waivers for Baltimore City and rural counties. |
| Massachusetts | Partial Waiver | Targeted declining industrial areas; state government actively litigated against USDA. |
| Michigan | Partial Waiver | Targeted specific high-unemployment counties (e.g., Wayne County), no longer statewide. |
| Minnesota | Partial Waiver | Lost waiver based on "underemployment" due to OBBBA rules, scope drastically reduced. 180 |
| Mississippi | No Waiver | Long-term strict statewide enforcement. |
| Missouri | No Waiver | Long-term strict statewide enforcement. |
| Montana | Partial Waiver | Mainly covering reservation counties. |
| Nebraska | No Waiver | Strictly enforced; approved to implement "junk food" ban. |
| Nevada | Statewide Waiver | Barely maintained statewide waiver due to tourism volatility causing higher unemployment (5.4%). 181 |
| New Hampshire | Partial Waiver | Limited to a few northern counties. |
| New Jersey | Partial Waiver | Southern counties and some urban centers. |
| New Mexico | Statewide Waiver | High poverty rates supported statewide waiver; large Indigenous population protected by new rules. 182 |
| New York | Statewide Waiver | Waiver set to forcibly terminate in Nov 2025 due to OBBBA rules; facing huge administrative cliff. 183 |
| North Carolina | No Waiver | No waiver since 2016. |
| North Dakota | Partial Waiver | Mainly targeting reservation counties. |
| Ohio | No Waiver | Strictly enforced. |
| Oklahoma | No Waiver | No waiver since 2013; implementing "junk food" ban. |
| Oregon | Partial Waiver | Rural counties waived; Portland metro area restricted. 184 |
| Pennsylvania | Partial Waiver | Philadelphia and rural counties waived; using state discretionary slots to fill gaps. 185 |
| Rhode Island | Partial Waiver | Targeted specific towns (e.g., Central Falls); active litigation against USDA. 186 |
| South Carolina | No Waiver | Strictly enforced. |
| South Dakota | Partial Waiver | Targeted reservation counties (e.g., Oglala Lakota). |
| Tennessee | No Waiver | Strictly enforced. |
| Texas | No Waiver | Strictly enforced; implementing "junk food" ban; quickly updated handbooks to implement OBBBA. |
| Utah | No Waiver | Strictly enforced; implementing "junk food" ban. |
| Vermont | No Waiver | Previously utilized waivers, but lost eligibility due to too low unemployment; provided state funds during shutdown. 187 |
| Virginia | Partial Waiver | Southwestern rural counties waived. |
| Washington | Partial Waiver -> None | By Nov 2025, due to OBBBA rules, no area in the state met waiver conditions. 188 |
| West Virginia | No Waiver | Voluntarily abandoned waiver despite economic difficulties. |
| Wisconsin | Partial Waiver | Targeted high-unemployment areas like Menominee County; strict workfare history from Walker era. |
| Wyoming | No Waiver | Strictly enforced. |

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**Part IX: Deep Insights and Future Outlook** 190

**9.1 The Logical Inversion from "Counter-Cyclical" to "Pro-Cyclical"** 191

The most essential change in policy evolution from 2010 to 2025 is the inversion of SNAP's economic logic. 192

* **Old Model (Counter-Cyclical):** In the ARRA era and subsequent years, the waiver mechanism was automatically triggered. 193When the economy turned down and unemployment rose, the waiver scope expanded, funding injection increased, and SNAP acted as an economic stabilizer. 194
* **New Model (Pro-Cyclical):** The OBBBA's 10% unemployment hard threshold broke this mechanism. 195In the modern economy, an unemployment rate of 7%-9% already represents a severe recession, but under the new rules, areas in such distress will be **unable** to obtain waivers. 196This means in future moderate recessions, when jobs become scarce, time limits will instead take effect, cutting off people's food sources, thereby deepening economic pain. 197

**9.2 The "Health Tax" on the Elderly Population** 198

Extending work requirements to age 64 is a radical reshaping of the definition of the American workforce. 199Among the low-income population aged 55-64, many suffer from some degree of chronic illness (such as arthritis, diabetes); these ailments, while insufficient to qualify them for SSI disability determination, are enough to limit their engagement in high-intensity manual labor. 200Given that the service industry and manual labor are their primary avenues for employment, mandating this demographic to work 20 hours a week is effectively levying a "health tax" on them: either work through pain or lose food. 201

**9.3 Administrative Burden as an Exclusion Tool** 202

The OBBBA introduced complex specific exemptions (such as for Urban Indians) while cancelling broad waivers, creating a "verification trap." 203State agencies are forced to become authenticators of tribal identity, while recipients need to provide complex written proof. 204This Administrative Burden is not an accidental side effect but part of the policy design. 205Faced with resource-strained state agencies, complex verification processes often lead to eligible people being rejected for procedural reasons, thereby effectively reducing benefit coverage without changing nominal legal eligibility. 206

**9.4 The New Normal of Judicial Federalism** 207

The *California v. USDA* lawsuit in 2025 indicates that the enforcement power of SNAP policy is shifting. 208Facing hostility from the federal executive branch, state Attorneys General are becoming the de facto guardians of the social safety net. 209When the executive branch attempts to "starve" the program by withholding funds, the judicial system becomes the last line of defense to maintain benefit issuance. 210This politicization and judicialization of executive power foreshadows that US social welfare policy will enter a new period of extreme instability and fragmentation. 211

**Conclusion** 212

The history of SNAP ABAWD policy from 2010 to 2025 is a history of rewriting the American social contract. 213From acknowledging in 2010 that structural unemployment required systemic protection, to establishing the absolute principle of "no work, no food" in 2025, the policy scales have tipped completely. 214Through the OBBBA, the federal government successfully pushed the work requirement age limit to the threshold of retirement and dismantled almost all buffer mechanisms for coping with economic fluctuations. 215

By the end of 2025, for a 58-year-old unemployed worker living in a county with 9% unemployment, or an Urban Indian attempting to prove their tribal identity, SNAP is no longer a reliable right, but an obstacle course filled with traps. 216This evolution has not only changed the dinner tables of tens of millions but has also profoundly reshaped the moral and economic logic of US anti-poverty policy. 217

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# 美国社会安全网的侵蚀与重构：2010-2025年SNAP ABAWD政策全美50州演变历史深度分析

## 执行摘要

在过去的十五年里，作为美国反饥饿第一道防线的补充营养援助计划（SNAP，即“食品券”），经历了一场深刻而动荡的变革。这场变革的核心焦点在于针对“无抚养眷属的身体健全成年人”（Able-Bodied Adults Without Dependents，简称ABAWD）的工作要求与时限政策。从2010年《美国复苏与再投资法案》（ARRA）时期的大规模豁免，到2025年《一个巨大美丽法案》（One Big Beautiful Bill Act，简称OBBBA）实施后的极端紧缩，ABAWD政策已从一种随经济周期波动的调节机制，演变为一种具有高度排他性的劳动力激活工具。

本报告基于详尽的联邦立法记录、州级行政数据、法庭文件及经济统计，对2010年至2025年间全美50个州的SNAP ABAWD政策演变进行了穷尽式的梳理与分析。研究发现，这一时期的政策轨迹呈现出显著的“去豁免化”趋势：联邦政府逐步剥夺了州政府根据地方经济实情申请豁免的权力，将豁免门槛从“劳动力过剩”收紧至“失业率超过10%”这一极难达到的硬性指标。与此同时，受工作要求限制的人群年龄上限从49岁激进地提升至64岁，从根本上改变了受影响群体的各个特征，将大量面临再就业困难的准老年群体纳入了惩罚性机制的射程。

此外，本报告深入剖析了联邦指令与州级自主权之间的激烈博弈。在2013年至2016年间，以堪萨斯州、缅因州为代表的共和党州率先自愿放弃豁免，以此作为意识形态试验田；而在2019年至2025年间，以加利福尼亚州、伊利诺伊州为代表的民主党州则通过法律诉讼和行政手段，试图在联邦紧缩的大潮中为弱势群体保留最后的安全网。2025年的联邦政府停摆及随后的诉讼风暴，更是将这种联邦制下的裂痕暴露无遗。

## 第一部分：ABAWD政策的基石与大萧条后的缓冲期（2010-2013）

### 1.1 制度原点：PRWORA与三月时限的法律架构

要理解2010年至2025年间SNAP政策的演变，必须回溯到1996年《个人责任与工作机会协调法案》（PRWORA）确立的法律框架。该法案首次在联邦层面引入了针对ABAWD群体的严厉时限。根据《食品与营养法》第6(o)条，年龄在18至49岁之间、非妊娠、且家庭中无未成年子女的身体健全成年人，如果在36个月内未能满足每月至少80小时的工作、职业培训或志愿服务要求，其领取SNAP福利的时间将被限制在3个月内 1。

然而，立法者在设计这一机制时，承认了劳动力市场的区域性差异，因此留下了两个至关重要的缓冲阀：

1. **地理豁免权（Geographic Waivers）：** 允许州政府向美国农业部（USDA）申请，在失业率超过10%或“缺乏充足就业岗位”（lack of sufficient jobs）的地区暂停实施时限 3。
2. **15%自由裁量豁免名额（Discretionary Exemptions）：** 允许州政府每年根据不合格ABAWD人数的15%获得一批豁免名额，用于特定的个案处理，且未使用的名额可以无限期结转（carryover）5。

在2010年之前，这些条款构成了SNAP政策的弹性基础。但在随后的十五年里，围绕“缺乏充足就业岗位”定义的解释权之争，成为了联邦与州政府博弈的核心战场。

### 1.2 ARRA时代的全面停火（2009-2010）

2010年的SNAP政策格局直接受制于2008年金融危机的余波。面对二战以来最严重的经济衰退，国会通过了《2009年美国复苏与再投资法案》（ARRA）。ARRA不仅增加了SNAP的福利金额，更关键的是，它包含了一项临时条款，在2009年4月至2010年9月期间，实际上在全国范围内暂停了ABAWD的时间限制 7。

这一决策背后的逻辑是清晰的：在全国失业率飙升至10%左右的环境下，惩罚找不到工作的个人不仅是不公正的，而且会削弱SNAP作为自动稳定器（automatic stabilizer）宏观经济功能。因此，在2010年，全美50个州几乎都处于某种形式的豁免保护之下。对于行政管理者而言，这是一段罕见的“停火期”，州机构无需追踪ABAWD的工作小时数，可以将精力集中在处理激增的申请案件上 9。

### 1.3 延长的保护伞：扩展失业福利触发机制（2011-2013）

虽然ARRA的法定暂停于2010年9月到期，但随后的几年里，绝大多数州并未立即恢复实施时限。这是因为USDA发布了指导意见，允许任何符合联邦“紧急失业补偿”（EUC）扩展福利资格的州，自动符合SNAP ABAWD豁免的“缺乏充足就业岗位”标准 7。

在2011和2012财年，由于劳动力市场的复苏极其缓慢，**46个州**以及华盛顿特区、关岛和维尔京群岛均符合这一标准，从而获得了全州范围的豁免（Statewide Waiver）11。这其中包括了后来在政策立场上截然对立的州：**加利福尼亚州、德克萨斯州、佛罗里达州、纽约州**在这一时期都采取了相同的策略——利用联邦提供的灵活性，最大限度地覆盖本州居民。

这一时期的数据显示，全美绝大多数ABAWD生活在豁免区内。这种广泛的覆盖掩盖了各州在意识形态上的潜在分歧，因为在极度困难的经济环境下，即使是保守派州长也难以拒绝联邦全额资助的食品援助进入本州经济循环。

## 第二部分：大分流——自愿恢复与意识形态实验（2013-2015）

随着2013年美国整体经济指标的好转，统一的豁免阵线开始瓦解。这种瓦解并非源于联邦法律的强制要求，而是源于部分共和党执政州的主动选择。这一阶段标志着SNAP政策从单纯的经济救助工具，转型为政治意识形态的试验场。

### 2.1 堪萨斯州的激进实验（2013）

堪萨斯州州长Sam Brownback成为了这场“重返工作”（Return to Work）运动的先锋。尽管堪萨斯州在2013年依然符合联邦豁免资格，但在2013年9月，州政府宣布自10月1日起不再续申请ABAWD豁免。这一决定直接影响了约20,000名失业成年人 13。

Brownback政府的理论基础是“福利陷阱”假说，认为豁免权的存在抑制了受助者的求职意愿。堪萨斯州儿童与家庭部（DCF）随后发布的数据被“政府问责基金会”（FGA）等保守派智库广泛引用。FGA的报告声称，在恢复工作要求后，ABAWD的案件量下降了75%，而离开项目者的收入平均增长了127% 15。

然而，这一叙事遭到了反饥饿组织的强烈反驳。他们指出，案件量的断崖式下跌并非意味着这些人找到了工作，而是大量贫困人口因无法满足苛刻的汇报要求或找不到符合20小时/周标准的工作而被剔除出了系统。堪萨斯州的实验成为了后来其他保守派州效仿的蓝本。

### 2.2 俄克拉荷马与缅因的跟随（2013-2014）

紧随堪萨斯之后，**俄克拉荷马州**于2013年10月1日允许其豁免过期，恢复了全州范围的工作要求 13。

更具标志性的是**缅因州**。在州长Paul LePage的领导下，缅因州于2014年10月重新实施了工作要求。实施后的三个月内，缅因州的ABAWD案件量从13,332例暴跌至4,540例，并在一年后降至2,000例以下 17。LePage政府将此视为消除福利依赖的重大胜利，甚至在后续的政策宣传中强调，这种“严厉的爱”促使人们进入了劳动力市场。然而，缅因州平等经济政策中心（MECEP）的跟踪研究发现，超过60%失去福利的人并未在随后的一年内找到稳定工作，而是陷入了更深的贫困与食物不安全之中 18。

### 2.3 威斯康星州的全面推行（2014-2015）

威斯康星州在Scott Walker州长的治下，采取了更为系统化的推进方式。该州不仅恢复了时限，还强制要求ABAWD参与名为“FoodShare Employment and Training (FSET)”的就业培训项目。虽然联邦法律要求各州为无法找到工作的人提供培训名额以避免其失去资格，但威斯康星州的模式更侧重于将参与FSET作为维持福利的唯一路径 19。这种模式后来被称为“威斯康星模式”，并在2016年大选后被特朗普政府视为联邦政策改革的潜在方向。

这一阶段的演变揭示了一个关键的政治动态：**SNAP政策的执行力度不再单纯取决于失业率，而是取决于州政府的政治倾向。** 在经济指标相似的州，ABAWD的命运可能截然不同——在伊利诺伊州，他们依然受到豁免保护；而在与之相邻的威斯康星州，他们则面临失去福利的风险。

## 第三部分：2016年断崖与“拼图式”豁免的兴起（2016-2018）

### 3.1 联邦保护伞的撤收

2016年被广泛认为是SNAP ABAWD政策的一个转折点。随着全美失业率持续下降，绝大多数州不再符合通过“延长失业福利”自动获得全州豁免的条件。根据FNS的估算，随着豁免在2016年1月至4月间陆续到期，全美有超过50万至100万名ABAWD面临失去福利的风险 9。

在这个时间节点，全美形成了三种截然不同的州级策略：

1. **全州实施者（The Implementers）：** 如**阿肯色州、佛罗里达州、密苏里州、北卡罗来纳州**。这些州即使部分地区（如高失业率的农村县）符合豁免条件，也选择在全州范围内实施时间限制，拒绝申请任何豁免。佛罗里达州自2016年1月1日起在全州恢复实施，导致数万名受助者在4月1日（三个月时限结束时）被切断福利 1。
2. **部分豁免者（The Partial Waiver States）：** 如**科罗拉多州、马萨诸塞州、华盛顿州**。这些州利用联邦法规允许的灵活性，申请了特定县或市的豁免。这种策略承认了州内经济发展的不平衡，保护了经济落后地区的居民 24。
3. **最大化豁免者（The Maximizers）：** 如**加利福尼亚州、伊利诺伊州、新墨西哥州**。这些州利用复杂的统计方法，将高失业率地区与低失业率地区“打包”（grouping），只要组合后的区域平均失业率比全国平均水平高出20%，即可申请豁免。这种策略使得这些州在整体经济复苏的情况下，依然能为大比例的人口保留豁免权 4。

### 3.2 地理打包（Grouping）的争议

“地理打包”策略成为了2016-2018年间的争议焦点。以加利福尼亚州为例，通过精心设计的区域组合，该州成功地为包括部分城市中心和广大农业区在内的大片领土保留了豁免资格。支持者认为，这是对联邦法规中“劳动力市场区域”（Labor Market Area）概念的合理运用，反映了工人跨县通勤的现实；反对者（主要是保守派立法者和后来的特朗普政府）则认为，这是对规则的滥用（gerrymandering），使得并不缺乏工作的地区也获得了豁免，违背了立法的初衷 27。

这一时期的数据显示，尽管全美失业率已降至5%以下，但仍有约三分之一的美国人口居住在SNAP豁免区内。这种现象直接诱发了随后特朗普政府的监管打击。

## 第四部分：特朗普政府的监管突袭与司法阻击（2019-2020）

### 4.1 2018年农业法案的博弈

2018年，国会在制定新一轮《农业法案》（Farm Bill）时，众议院共和党人试图将更严格的ABAWD工作要求写入法律，包括限制各州的豁免权。然而，在参议院民主党的强烈反对下，最终通过的《2018年农业法案》并未包含这些激进条款，反而保留了各州申请豁免的灵活性 27。

### 4.2 2019年最终规则（Final Rule）：行政权的扩张

在立法受阻后，特朗普政府的USDA直接动用行政权力，于2019年2月发布拟议规则，并于同年12月发布“最终规则”（Final Rule）。该规则旨在从根本上收紧豁免标准：

1. **设定6%的失业率底线：** 即使一个地区的失业率比全国平均水平高出20%，其绝对失业率也必须达到6%才能申请豁免。在当时全美失业率约为3.7%的背景下，这一底线极高 30。
2. **禁止随意打包：** 严格限制各州将不同县组合在一起的能力，要求只能基于联邦定义的劳动力市场区域进行组合 27。
3. **限制结转名额：** 试图取消15%自由裁量豁免名额的无限期结转，防止各州“囤积”名额 27。

USDA明确表示，此举是为了防止各州在经济强劲时“滥用”豁免权。据估计，该规则一旦实施，将导致约70万人失去SNAP福利 33。

### 4.3 *District of Columbia v. USDA*：法律战与大流行的介入

就在新规则原定于2020年4月1日生效前夕，由19个州（包括纽约州、加利福尼亚州、马萨诸塞州等）、哥伦比亚特区和纽约市组成的联盟起诉了USDA。在*District of Columbia v. USDA*一案中，原告方指控USDA的规则不仅违反了《行政程序法》（APA），而且公然违背了国会在2018年《农业法案》中维持现状的意图 34。

2020年3月13日，就在规则生效前两周，哥伦比亚特区联邦地方法院法官Beryl A. Howell发布了初步禁令（Preliminary Injunction），阻止了规则中关于收紧豁免标准部分的实施。法官在裁决中特别提到了正在逼近的COVID-19大流行，指出在公共卫生危机期间剥夺人们的食品援助是不可想象的 34。这一裁决实际上冻结了特朗普政府改革ABAWD政策的努力，为随后的疫情期间政策铺平了道路。

## 第五部分：疫情期间的冻结与福利悬崖（2020-2023）

### 5.1 FFCRA的全面暂停

随着COVID-19疫情的爆发，国会迅速通过了《家庭优先冠状病毒应对法案》（FFCRA）。该法案规定，在联邦公共卫生紧急状态（PHE）期间，暂停实施ABAWD的三个月时间限制 36。这意味着从2020年4月1日起，全美所有SNAP受助者，无论身处何地，无论是否工作，都不会因时间限制而失去福利。

此外，紧急配额（Emergency Allotments, EAs）的引入使得所有家庭都能获得该家庭规模对应的最高福利额度（后调整为至少增加95美元）37。这是SNAP历史上福利最丰厚、门槛最低的时期。

### 5.2 2023年的“福利悬崖”与PHE的终结

这种宽松局面在2023年迎来了急剧的逆转。《2023年综合拨款法案》决定提前终止紧急配额，全美最后与EA告别的州在2023年2月发放了最后一笔款项 39。与此同时，随着PHE于2023年5月11日正式结束，FFCRA对ABAWD时限的暂停也随之失效。

从2023年7月1日起，各州被迫重启ABAWD时限追踪系统。对于许多在疫情期间加入SNAP的工作人员和受助者来说，这不仅是政策的回归，更是一次巨大的行政休克。为了缓解这种冲击，部分州（如加利福尼亚州、马萨诸塞州）尝试动用州级资金进行短暂的过渡，但这无法改变联邦规则回归严厉的基本事实 41。

## 第六部分：立法大反转——从FRA到OBBBA（2023-2025）

2023年至2025年间，SNAP政策经历了两次重大的立法冲击，彻底重塑了ABAWD的定义和豁免机制。

### 6.1 2023年《财政责任法案》（FRA）：年龄扩张的序幕

2023年6月，作为提高债务上限谈判的一部分，国会通过了《财政责任法案》（FRA）。该法案对ABAWD政策进行了自1996年以来最显著的修改 43：

1. **年龄上限逐步提升：** 将适用ABAWD规定的年龄上限从49岁逐步提高至54岁。
   * 2023年9月1日：提至50岁。
   * 2023年10月1日：提至52岁。
   * 2024年10月1日：提至54岁 45。
2. **新增豁免群体：** 为了平衡年龄提升的影响，FRA豁免了退伍军人、无家可归者和24岁及以下的前寄养青年 47。
3. **削减自由裁量名额：** 将各州每年的自由裁量豁免名额比例从12%降至8%，并严格限制了名额的结转能力 6。

FRA的实施给各州带来了巨大的行政挑战，要求他们重新编程系统以识别新纳入的50-54岁群体，同时建立识别无家可归者和退伍军人的新流程。

### 6.2 2025年《一个巨大美丽法案》（OBBBA）：历史性的紧缩

然而，FRA仅仅是前奏。2025年7月4日，唐纳德·特朗普总统签署了《一个巨大美丽法案》（OBBBA，H.R. 1）。这部法案对SNAP进行了“焦土式”的改革，其严厉程度史无前例 50。

#### 6.2.1 年龄上限暴增至64岁

OBBBA最激进的条款是将ABAWD的年龄上限一口气提升至**64岁** 53。这意味着大量准退休人员、通常面临严重年龄歧视和慢性健康问题的群体，现在必须满足每周20小时的工作要求才能获得食品援助。据统计，SNAP受助者中有相当比例属于55-64岁这一年龄段，他们往往既不符合残疾福利（SSI/SSDI）的严格标准，又难以在体力劳动市场找到工作 56。

#### 6.2.2 废除“缺乏充足就业岗位”豁免标准

OBBBA从根本上摧毁了各州申请地理豁免的能力。法案删除了“缺乏充足就业岗位”这一灵活标准，规定除非是阿拉斯加或夏威夷的特定区域，否则一个地区必须证明其\*\*失业率超过10%\*\*才能获得豁免 58。

在2025年美国整体失业率维持在4.0%-4.5%左右的宏观背景下，10%的门槛几乎是不可逾越的。这一改变导致华盛顿州、明尼苏达州等此前依赖“就业不足”证据申请豁免的州，在一夜之间失去了所有豁免资格 60。即使是长期维持全州豁免的加利福尼亚州，其大部分县也不再符合条件，仅剩因皮里尔县（Imperial County）等极少数农业县幸存 62。

#### 6.2.3 豁免群体的“清洗”与部落豁免的引入

OBBBA废除了FRA仅仅两年前建立的针对无家可归者、退伍军人和前寄养青年的豁免 53。这种立法上的“急转弯”导致了极大的行政混乱和受助者的困惑。

作为替代，OBBBA引入了针对“印第安人”、“城市印第安人”和“加利福尼亚印第安人”（根据IHCIA定义）的豁免 65。这一条款旨在保护贫困率极高的原住民群体。然而，其实施过程充满了挑战，特别是对于居住在保留地之外的“城市印第安人”，州机构难以验证其身份资格，导致了新的官僚主义障碍 65。

#### 6.2.4 “垃圾食品”禁令的死灰复燃

OBBBA还授权USDA批准各州限制SNAP购买“垃圾食品”（如苏打水、糖果）的豁免申请。到2025年底，包括**德克萨斯州、佛罗里达州、爱荷华州**在内的12个共和党州已获得批准，将于2026年实施这一限制 66。这标志着SNAP政策从单纯的“反饥饿”向“行为以此为条件”的家长式管理转变。

## 第七部分：2025年联邦停摆危机与州际大分化

2025年10月，联邦政府因预算僵局陷入停摆。与以往不同，此次特朗普政府拒绝动用USDA的应急储备金（contingency funds）来支付11月的SNAP福利，导致福利发放被暂停 68。这一危机将各州推向了崩溃的边缘，并引发了激烈的法律对抗。

### 7.1 *California v. USDA*：司法救济

由加利福尼亚州、马萨诸塞州和纽约州总检察长领衔的25州联盟迅速起诉USDA。原告方认为，USDA拥有约60亿美元的应急资金，且有法定义务维持SNAP福利的发放，其拒绝动用资金的行为是武断和违法的 70。

2025年11月初，罗德岛和马萨诸塞州的联邦法官发布了临时限制令（TRO），强制USDA释放资金 72。这一法律胜利虽然恢复了资金流，但迟到的拨款导致了福利发放的严重延误和混乱。

### 7.2 各州的应对策略

在这场危机中，各州的反应呈现出鲜明的党派色彩：

* **保护型策略（蓝州）：** 加利福尼亚州、佛蒙特州和马萨诸塞州在联邦资金到位前，动用州级储备金先行垫付了部分或全部福利，确保居民不断粮 74。同时，这些州最大限度地利用剩余的8%自由裁量名额，保护受OBBBA新规影响的60-64岁老人。
* **执行型策略（红州）：** 德克萨斯州、佛罗里达州和爱荷华州则严格遵循联邦的停摆指令，并未动用州资金填补缺口。同时，这些州积极准备实施OBBBA的各项限制，包括更新系统以剔除不符合新工作要求的受助者 76。

## 第八部分：全美50州ABAWD政策状态全景表（2025财年）

下表基于2025年1月1日的数据，总结了各州的豁免状态。值得注意的是，由于OBBBA的10%失业率门槛于2025年下半年全面生效，许多在年初尚有部分豁免的州，到年底已完全失去豁免资格。

### 表1：2025财年各州SNAP ABAWD豁免状态概览

|  |  |  |
| --- | --- | --- |
| **州名** | **2025财年豁免状态** | **政策演变与备注** |
| **阿拉巴马州** | 无豁免 | 自2016年起长期无豁免，严格执行。 |
| **阿拉斯加州** | 部分豁免 | 保留了部分农村普查区的豁免；受惠于OBBBA的原住民豁免新规。 |
| **亚利桑那州** | 部分豁免 | 针对部落土地和部分高失业率县的豁免；受原住民豁免保护较大。 |
| **阿肯色州** | 无豁免 | 2016年自愿结束豁免；已获批实施“垃圾食品”禁令。 |
| **加利福尼亚州** | **全州豁免** | 2025年2月至2026年1月获批全州豁免（基于OBBBA生效前的旧标准申请），是最后的堡垒之一 4。 |
| **科罗拉多州** | 部分豁免 | 针对特定县；积极利用自由裁量名额。 |
| **康涅狄格州** | 部分豁免 | 针对劳动力过剩地区。 |
| **特拉华州** | **全州豁免** | 基于近期失业率飙升获得批准；停摆期间动用州资金垫付 1。 |
| **哥伦比亚特区** | **全州豁免** | 因特区内结构性失业长期维持全州豁免 1。 |
| **佛罗里达州** | 无豁免 | 自2016年起严格执行；2025年积极实施“垃圾食品”禁令。 |
| **乔治亚州** | 无豁免 | 2025年全面恢复工作要求；11月起将年龄上限推至65岁 52。 |
| **夏威夷州** | 部分豁免 | 邻岛获得豁免；OBBBA保留了针对非本土州的特殊豁免条款（1.5倍全国失业率）1。 |
| **爱达荷州** | 无豁免 | 严格执行；已获批实施“垃圾食品”禁令。 |
| **伊利诺伊州** | **全州豁免** | 豁免有效期至2027年1月（基于旧标准），但面临OBBBA 10%硬性指标的未来威胁 26。 |
| **印第安纳州** | 无豁免 | 严格执行；已获批实施“垃圾食品”禁令。 |
| **爱荷华州** | 无豁免 | 通过州立法限制SNAP购买范围；无豁免。 |
| **堪萨斯州** | 无豁免 | 2013年自愿放弃豁免的先驱。 |
| **肯塔基州** | 部分豁免 | 仅限东部煤炭产区县。 |
| **路易斯安那州** | 无豁免 | 部分豁免于2024年10月到期；新州法限制申请未来豁免；实施“垃圾食品”禁令 76。 |
| **缅因州** | 部分豁免 | 米尔斯政府时期扭转了LePage时期的全面限制，寻求农村地区豁免。 |
| **马里兰州** | 部分豁免 | 巴尔的摩市及农村县豁免。 |
| **马萨诸塞州** | 部分豁免 | 针对衰退工业区；州政府积极诉讼对抗USDA。 |
| **密歇根州** | 部分豁免 | 针对特定高失业县（如韦恩县），不再是全州豁免。 |
| **明尼苏达州** | 部分豁免 | 因OBBBA新规失去了基于“就业不足”的豁免，范围大幅缩减 60。 |
| **密西西比州** | 无豁免 | 长期全州严格执行。 |
| **密苏里州** | 无豁免 | 长期全州严格执行。 |
| **蒙大拿州** | 部分豁免 | 主要覆盖保留地县。 |
| **内布拉斯加州** | 无豁免 | 严格执行；已获批实施“垃圾食品”禁令。 |
| **内华达州** | **全州豁免** | 因旅游业波动导致失业率较高（5.4%），勉强维持全州豁免 1。 |
| **新罕布什尔州** | 部分豁免 | 仅限北部少数县。 |
| **新泽西州** | 部分豁免 | 南部县及部分城市中心。 |
| **新墨西哥州** | **全州豁免** | 高贫困率支撑了全州豁免；原住民人口众多，受新规保护 1。 |
| **纽约州** | **全州豁免** | 豁免定于2025年11月因OBBBA新规强制终止；面临巨大行政悬崖 82。 |
| **北卡罗来纳州** | 无豁免 | 2016年起无豁免。 |
| **北达科他州** | 部分豁免 | 主要针对保留地县。 |
| **俄亥俄州** | 无豁免 | 严格执行。 |
| **俄克拉荷马州** | 无豁免 | 2013年起无豁免；实施“垃圾食品”禁令。 |
| **俄勒冈州** | 部分豁免 | 农村县豁免；波特兰都会区受限 84。 |
| **宾夕法尼亚州** | 部分豁免 | 费城及农村县豁免；利用州自由裁量名额填补缺口 85。 |
| **罗德岛州** | 部分豁免 | 针对特定城镇（如Central Falls）；积极诉讼对抗USDA 86。 |
| **南卡罗来纳州** | 无豁免 | 严格执行。 |
| **南达科他州** | 部分豁免 | 针对保留地县（如Oglala Lakota）。 |
| **田纳西州** | 无豁免 | 严格执行。 |
| **德克萨斯州** | 无豁免 | 严格执行；实施“垃圾食品”禁令；迅速更新手册落实OBBBA。 |
| **犹他州** | 无豁免 | 严格执行；实施“垃圾食品”禁令。 |
| **佛蒙特州** | 无豁免 | 此前利用豁免，但因失业率过低失去资格；停摆期间提供州资金 75。 |
| **弗吉尼亚州** | 部分豁免 | 西南部农村县豁免。 |
| **华盛顿州** | 部分豁免->无 | 2025年11月因OBBBA新规，全州无任何区域符合豁免条件 61。 |
| **西弗吉尼亚州** | 无豁免 | 尽管经济困难，但自愿放弃豁免。 |
| **威斯康星州** | 部分豁免 | 针对梅诺米尼县等高失业区；Walker时期有严格工作福利历史。 |
| **怀俄明州** | 无豁免 | 严格执行。 |

## 第九部分：深度洞察与未来展望

### 9.1 从“逆周期”到“顺周期”的逻辑倒置

2010年至2025年的政策演变，最本质的变化是SNAP经济逻辑的倒置。

* **旧模式（逆周期）：** 在ARRA时代及随后的几年里，豁免机制是自动触发的。当经济下行、失业率上升时，豁免范围扩大，资金注入增加，SNAP充当了经济稳定器。
* **新模式（顺周期）：** OBBBA的10%失业率硬门槛打破了这一机制。在现代经济中，7%-9%的失业率已代表严重衰退，但在新规则下，处于这种困境的地区将**无法**获得豁免。这意味着在未来的中度衰退中，当工作岗位变得稀缺时，时间限制反而会生效，切断人们的食品来源，从而加深经济痛苦。

### 9.2 针对老年群体的“健康税”

将工作要求延伸至64岁，是对美国劳动力定义的一次激进重塑。55-64岁的低收入群体中，许多人患有某种程度的慢性病（如关节炎、糖尿病），这些病痛虽然不足以让他们获得SSI残疾认定，但足以限制他们从事高强度的体力劳动。在服务业和体力劳动是其主要就业途径的情况下，强制要求这部分人群每周工作20小时，实际上是对他们征收的一种“健康税”：要么忍痛工作，要么失去食物。

### 9.3 行政负担作为一种排斥工具

OBBBA在取消广泛豁免的同时引入了复杂的特定豁免（如城市印第安人），这创造了一个“验证陷阱”。州机构被迫成为部落身份的鉴定者，而受助者则需要提供复杂的书面证明。这种行政负担（Administrative Burden）并非偶然的副作用，而是政策设计的一部分。在资源紧张的州级机构面前，复杂的验证流程往往导致符合条件的人因程序原因被拒绝，从而在不改变法律名义资格的情况下，实际上缩减了福利覆盖面。

### 9.4 司法联邦主义的新常态

2025年的*California v. USDA*诉讼表明，SNAP政策的执行权正在发生转移。面对联邦行政部门的敌意，州总检察长正在成为事实上的社会安全网守护者。当行政部门试图通过扣留资金来“饿死”项目时，司法系统成为了维持福利发放的最后一道防线。这种行政权的政治化和司法化，预示着美国社会福利政策将进入一个极度不稳定和碎片化的新时期。

## 结论

2010年至2025年的SNAP ABAWD政策史，是一部美国社会契约的重写史。从2010年承认结构性失业需要系统性保护，到2025年确立“不工作即无食”的绝对原则，政策的天平已完全倾斜。通过OBBBA，联邦政府成功地将工作要求的年龄上限推至退休门槛，并拆除了几乎所有因应经济波动的缓冲机制。

截至2025年底，对于生活在失业率为9%的县份的58岁失业工人，或是试图证明自己部落身份的城市印第安人来说，SNAP不再是一个可靠的权利，而是一个布满陷阱的障碍赛。这一演变不仅改变了数千万人的餐桌，也深刻地重塑了美国反贫困政策的道德与经济逻辑。