**The Great Contraction: The 2025 "One Big Beautiful Bill Act" (OBBBA) and the Fragmentation of the American Social Safety Net — Comprehensive Policy Analysis Report**

### 1. Introduction: Paradigm Shift and the End of Federalism 22

On July 4, 2025, with the signing of Public Law 119-21, the "One Big Beautiful Bill Act of 2025" (hereinafter referred to as "OBBBA" or "the Act"), US social welfare policy underwent its most drastic structural upheaval since the 1996 welfare reform333. Although nominally a comprehensive tax and spending bill passed through the budget reconciliation process, its core provisions fundamentally reconstructed the Supplemental Nutrition Assistance Program (SNAP)4.

This report aims to provide a detailed, expert-level policy analysis exploring how the OBBBA has ended SNAP's historical role as a counter-cyclical economic stabilizer by modifying the definition of dependents, raising the age limit for work requirements, abolishing exemptions for vulnerable groups, and reshaping the federal-state fiscal sharing mechanism55. Particularly in the policy area of "Able-Bodied Adults Without Dependents" (ABAWD), the federal government's introduction of the "10% Unemployment Rule" has nearly obliterated the power of states to apply for waivers based on local economic conditions, leading to unprecedented chaos and polarization in policy implementation across all 50 states66.

As of late autumn 2025, following the resolution of the federal government shutdown crisis and the outbreak of a wave of litigation, a fragmented picture of the national safety net has emerged: some states (such as Massachusetts and California) have chosen to confront the US Department of Agriculture (USDA) administrative directives in court; others (such as Texas and Florida) have moved quickly to advance strict compliance measures; while states in the "Rust Belt" (such as Michigan and Pennsylvania), caught in the middle, face the dual blow of surging administrative costs and a benefits cliff for vulnerable groups after losing waiver rights7.

### 2.

Legislative Architecture and Policy Logic: Analysis of OBBBA's Core Mechanisms 8

The OBBBA is not simply a budget cut; it represents a fundamental philosophical shift—transforming SNAP from a needs-based "Entitlement" to a "conditional benefit" based on labor market participation99. The Congressional Budget Office (CBO) estimates that changes to nutrition provisions alone will reduce federal spending by approximately $187 billion between 2025 and 203410101010.

**2.1 Radical Expansion of ABAWD Definition and Abolition of Exemptions** 11

Section 10102 of the OBBBA enacted the most significant expansion of the ABAWD definition in thirty years 12. previously, the age limit for work requirements was 54 (phased in under the *Fiscal Responsibility Act of 2023*)13. The OBBBA pushes this limit directly to **64 years old**141414. This means that the 55-64 age group, which often faces chronic health issues, a digital divide, and re-employment discrimination, must now meet the requirement of 80 hours of work or training per month, otherwise, they will be limited to receiving benefits for only 3 months within every 36-month period15.

Even more stringent is the narrowing of the "dependent" definition16. Under the old law, adults were exempt from ABAWD rules as long as there was a child under 18 in the household17. The OBBBA lowers this age threshold to **14 years old**181818. The ripple effect of this change is immense: a single mother raising a 15-year-old high school student, previously exempt as a caregiver, is now reclassified as an ABAWD and must find full-time work while caring for a teenager19.

**Table 2.1: Comparison of Core ABAWD Policy Changes** 2020

| **Policy Dimension** | **Before OBBBA (Old Law)** | **After OBBBA (New Law, fully effective Nov 2025)** | **Policy Impact Analysis** |
| --- | --- | --- | --- |
| Age Range | 18 - 54 years old | 18 - **64** years old 21 | Expands work requirements to groups nearing retirement age; health screening burden surges. 2222 |
| Dependent Child Age | Under 18 | Under **14** 23 | Parents with children aged 14-17 are no longer automatically exempt, ignoring adolescent care needs. 2424 |
| Veteran Exemption | Statutory Exemption | Exemption **Repealed** 2525 | Low-income groups who served the country lose protection and need to recertify disability. 2626 |
| Homeless Exemption | Statutory Exemption | Exemption **Repealed** 2727 | Requires work hour records for those without fixed addresses; administratively extremely difficult to enforce. 2828 |
| Foster Youth Exemption | Exempt under 24 | Exemption **Repealed** 2929 | Youth just leaving the foster care system face the risk of immediate loss of benefits. 3030 |
| Indigenous Exemption | No specific clause | **New Exemption** Added 3131 | Provides exemption for Indians defined by IHCIA, but verification mechanisms are complex. 3232 |

**2.2 The "10% Rule": The Mathematical End of Waiver Mechanisms** 3333

Section 10003 of the OBBBA dealt a devastating blow to states' rights to apply for work requirement waivers3434. Previously, if an area's unemployment rate was 20% higher than the national average (usually around 4.5%-5%), the state government could apply for a waiver3535. This provided an important buffer for economically depressed areas3636.

The OBBBA abolished the vague standard of "lack of sufficient jobs" and introduced a hard **"10% unemployment threshold"**373737. Under the new rule, no waiver may be granted unless the unemployment rate in the area exceeds 10%38.

* **Statistical Impossibility:** In the modern US economy, even in areas deep in recession, the official unemployment rate rarely stays above 10% consistently3939. For example, during most of 2025, unemployment rates in even the most depressed counties of the "Rust Belt" hovered between 6%-8%4040. Setting a 10% threshold essentially bans waiver rights nationwide (with very few exceptions) permanently4141.
* **Alaska and Hawaii Exception Clause:** Considering the particularities of non-contiguous states, the Act allows Alaska and Hawaii to apply for waivers when the unemployment rate reaches 150% of the national average424242. This geographic double standard has become a focal point of constitutional review regarding "equal protection" in current lawsuits43.

**2.3 Reconstruction of Fiscal Federalism: Administrative Cost Shifting** 4444

In addition to tightening benefit eligibility, the OBBBA fundamentally changed SNAP's funding structure, implementing a massive cost shift4545:

* **Administrative Cost Sharing (Section 10106):** Starting in FY 2027, the federal reimbursement rate for state-level administrative costs will be cut from 50% to **25%**, forcing states to bear **75%** of operating costs46464646. This is a massive "fiscal cliff" for states that are already fiscally strapped47.
* **Benefit Cost Sharing (Section 10105):** Starting in FY 2028, if a state's Payment Error Rate exceeds 6%, the state government will be forced to share part of the cost of the actual benefits issued484848484848. This mechanism creates a perverse incentive: to avoid fines caused by "overpayment," states may tend to adopt a more conservative or even harsh attitude in eligibility reviews, thereby leading to the erroneous rejection of compliant applicants4949.

### 3.

Execution Crisis and Judicial Confrontation: The Chaos of Autumn 2025 50

The implementation of the OBBBA was not smooth. The federal government shutdown in October 2025, combined with the Trump administration's attempt to use the new bill to withhold November SNAP benefits, triggered a constitutional crisis5151.

**3.1 The "Impoundment" Crisis and *Massachusetts v. USDA*** 5252

In October 2025, as various provisions of the OBBBA were about to take effect, the federal government fell into a shutdown due to a budget deadlock5353. The Trump administration, acting in the spirit of the OBBBA, attempted not only to pause administrative funding but even planned to withhold the issuance of November benefits, arguing that Section 32 funds should not be used to fill the gap54545454.

This move immediately triggered a joint lawsuit by 26 states led by Massachusetts (*Massachusetts v. USDA*)55555555. The plaintiff states accused the federal government of violating the *Impoundment Control Act* and the "faithful execution" clause of the Constitution5656. The Federal District Court in Rhode Island responded quickly to the case; Judge John J. McConnell Jr. issued a Temporary Restraining Order (TRO), severely condemning the administration for withholding food benefits "for political reasons" and mandating the full issuance of November benefits57575757. Although the benefits were ultimately issued, this event completely destroyed the foundation of trust between the federal government and states regarding SNAP management5858.

**3.2 Retroactive Termination of Waivers and *California v. USDA*** 5959

Meanwhile, California launched a counterattack on another front6060. The USDA issued a guidance memorandum announcing that based on the new standards of the OBBBA, all existing ABAWD waivers would automatically terminate on November 1, 2025, regardless of their original expiration dates61. California argued that this retroactive termination violated the *Administrative Procedure Act* (APA) because it did not leave states enough time to adjust administrative systems or notify the millions affected62.

Although California applied for a preliminary injunction, the Supreme Court's attitude in related cases suggests that the judicial system may lean towards allowing the executive branch to execute the clear legislative intent of Congress, even if the execution process appears hasty and chaotic63636363. This has forced California to litigate while simultaneously preparing to implement new rules amidst the chaos6464.

### 4.

Deep Analysis of Policy Implementation Status Across 50 States (2025-2026) 6565

Based on the legal framework of the OBBBA and subsequent judicial battles, SNAP/ABAWD policies across US states present extreme polarization in late 20256666. We analyze the states in five categories: **Judicial Resistance Zones** (actively litigating and attempting to maintain original policies), **Forced Transition Zones** (lost waivers and facing administrative collapse), **Rapid Compliance Zones** (actively adopting strict standards), **Special Exception Zones** (Alaska and Hawaii), and **Full Enforcement Zones** (no waivers and fully executing)6767.

**Group 1: The Judicial Resistance** 6868

States in this group are typically governed by Democrats and have large social welfare systems; the administrative and fiscal shock caused by the OBBBA is most severe for them6969. They choose to delay policy execution through legal means and use state-level funds to fill gaps7070.

1. California 7171

* **Status:** Partial waiver revoked / Intense litigation / Implementing Indian exemption 7272
* **Waiver Status:** California originally had a statewide ABAWD waiver scheduled to last until 20267373. However, under the OBBBA, this statewide waiver was forcibly terminated7474. As of November 1, 2025, the USDA approved waiver applications only for **Colusa, Imperial, and Tulare** counties, as only the unemployment rates in these areas barely met the new standards75757575.
* **Policy Response:** Governor Newsom instructed the Department of Social Services (CDSS) to maximize the use of the new "Indian" exemption clause in the OBBBA7676. Since California has a large urban Indian population, the state government is attempting to classify as many recipients as possible as exempt through cooperation with the Indian Health Service (IHS)7777. However, the verification process is extremely cumbersome7878.
* **Fiscal Impact:** California is expected to lose approximately $499 million in federal food funds due to the expiration of time limits7979. Additionally, the state has joined the multi-state lawsuit accusing the federal government of illegally withholding funds80808080.

2. New York 8181

* **Status:** Waiver terminated / Expected administrative chaos / Legal Aid intervention 8282
* **Waiver Status:** New York State's ABAWD waiver formally ended in November 20258383. Starting in December, statewide areas including New York City will implement strict work requirements for the first time84848484.
* **Specific Impact:** It is estimated that approximately 100,000 ABAWDs in New York City (NYC) will be forced to find work or attend training within a short period8585. Due to NYC's complex demographic structure, the Department of Social Services (DSS) faces a huge administrative challenge, needing to send millions of compliance notices in 15 languages86868686.
* **Legal Action:** The Legal Aid Society and the Urban Justice Center have sued the USDA, accusing the early termination of waivers of causing an "inoperable" administrative burden8787. New York State is also one of the biggest victims of the new administrative cost-sharing rules, as SNAP administration in the state is the responsibility of counties; the 75% cost shift will lead to fiscal collapse for counties88888888.

3. Massachusetts 89

* **Status:** Litigation leader / Strictly enforcing 10% rule 90
* **Waiver Status:** Before the OBBBA, Massachusetts utilized the "lack of sufficient jobs" standard to exempt many areas9191. Now, because no area's unemployment rate exceeds 10%, **not a single area in the state is spared**, and all ABAWDs must comply with work requirements92929292.
* **Policy Response:** As the lead plaintiff in *Massachusetts v. USDA*, the State Attorney General not only challenged the withholding of funds but also attacked the constitutionality of the OBBBA9393. The Department of Transitional Assistance (DTA) is sending warning letters to people aged 18-64 and attempting to expand the capacity of the state employment training program (SNAP E&T) to accommodate the surge in demand94949494.

4. Washington 95

* **Status:** Waivers fully revoked / Governor intervention 96
* **Waiver Status:** Washington previously had 38 counties enjoying waivers9797. But on November 3, 2025, all waivers were revoked by the USDA under the OBBBA; currently, there are no FNS-approved waiver zones in the state98989898.
* **Policy Response:** Governor Bob Ferguson issued a statement celebrating the court ruling mandating the issuance of November benefits, but also acknowledged that the future of ABAWD time limits is "full of uncertainty"99999999. The Department of Social and Health Services (DSHS) is urgently updating the 36-month counting cycle, warning all ABAWDs in non-exempt areas that they must immediately meet work requirements100100100100.

5. Illinois 101

* **Status:** Waivers completely lost / Budget crisis / Executive Order 102
* **Waiver Status:** Illinois's waivers ended in November 2025103103. Under the new rules, **no county in Illinois has an unemployment rate exceeding 10%**, so it cannot apply for any geographic waivers104104104104.
* **Specific Impact:** The ABAWD population surged instantly from about 189,000 to 446,000105105105105. The state government estimates that about 340,000 people face the risk of losing benefits, including 23,000 homeless individuals and veterans who were previously exempt106106106106.
* **Policy Response:** Governor Pritzker issued an executive order condemning the federal government's actions and directing the Department of Human Services (IDHS) to find all possible administrative means to reduce impact, such as expanding the scope of disability exemptions through medical screening107107107107.

**Group 2: The Displaced / Rust Belt** 108

States in this group are mostly "Rust Belt" or industrial decline areas109. Although there is genuine economic distress locally, official unemployment rates fail to reach the extreme 10% threshold set by the OBBBA, causing them to lose their original protective umbrella110.

6. Michigan 111

* **Status:** Waivers extremely reduced / Oscoda exception 112
* **Waiver Status:** Michigan originally had extensive waiver zones113113. But under OBBBA rules, only **Oscoda County** retained waiver rights because its unemployment rate exceeded 10%114114114114.
* **Impact Analysis:** Long-term poverty areas like Wayne County (Detroit) and Genesee County (Flint) lost protection because unemployment statistics did not meet the standard115115115115. This is a typical "statistical trap" case—the OBBBA ignores structural poverty and looks only at the single indicator of unemployment rate116116116116.

7. Pennsylvania 117

* **Status:** Waivers lost / Full implementation of 64-year-old rule 118
* **Waiver Status:** The Pennsylvania Department of Human Services clearly stated that due to changes in federal law, the state "is no longer eligible to apply for waivers by county or municipality"119119119119.
* **Implementation Details:** The state began phased implementation of new rules as early as September 1, 2025; by November 1, all ABAWDs aged 18-64 were included in the time limit system120. This means the state's vast rural poor population must now find 20 hours of work per week in areas with scarce employment opportunities121.

8. Ohio 122

* **Status:** No waivers / County fiscal pressure 123
* **Specifics:** Ohio is a county-administered state124124. As the OBBBA raises the administrative cost-sharing ratio to 75%, Ohio's counties will face immense fiscal pressure, potentially leading to layoffs in Job and Family Services (JFS) offices, which will exacerbate benefit approval backlogs and error rates125125125125.

9. New Jersey 126

* **Status:** Application rejected / Relying on volunteer service 127
* **Waiver Status:** New Jersey had applied to exempt 20 counties between February 2025 and January 2026, but given unemployment data, this application was almost destined to fail under the OBBBA framework128128128128.
* **Measures:** The state government is heavily promoting "volunteering" as a way to meet the 80-hour requirement, but local non-profits report they lack the capacity to provide compliant volunteer positions for so many people129129129129.

10. Wisconsin 130

* **Status:** No waivers / Cost-sharing pressure 131
* **Impact:** As a county-administered state, Wisconsin's counties will bear the added administrative costs132. The state legislature tends to support work requirements, so there is less resistance at the state level, but the funding gap at the grassroots execution level is huge133.

11. Connecticut 134

* **Status:** No waivers 135
* **Analysis:** Wealthy suburbs drag down the statewide unemployment rate, leaving residents of impoverished cities like Bridgeport and Hartford unable to obtain waivers136.

12-14. Maine, Vermont, New Hampshire 137

* **Status:** No waivers / Aging shock 138
* **Analysis:** These states have a high proportion of older workers139. Raising the work requirement age limit from 54 to 64 has caused a direct shock to low-income elderly people in rural areas of these states140.

**Group 3: The Compliant / The South** 141

States in this group (mainly in the South and Midwest) politically tend to support stricter welfare restrictions142. They not only quickly implemented OBBBA regulations but some even proactively took measures more radical than federal requirements143.

15. Texas 144

* **Status:** Strict enforcement / Refusing Summer EBT 145
* **Implementation:** Texas enforces work requirements for the 18-64 population very thoroughly146146. The state government specifically emphasized that parents with children aged 15, 16, and 17 must now work and no longer enjoy exemptions147147147147.
* **Political Stance:** Citing concerns over future state fiscal obligations brought by the OBBBA, Texas chose to opt out of the federal "Summer EBT" program, demonstrating the state's hardline stance on cutting welfare spending148148148148.

16. Florida 149

* **Status:** No waivers / Nightmare for seasonal workers 150
* **Analysis:** Florida's tourism economy is highly seasonal151151. The ABAWD three-month time limit means that tens of thousands of service industry workers unable to get enough hours in the off-season will cyclically lose SNAP eligibility152152152152.

17. Georgia 153

* **Status:** Double lock (Medicaid + SNAP) 154
* **Specifics:** Georgia is the only state that simultaneously implements Medicaid work requirements155155155155. The new OBBBA SNAP rules overlap with the state's existing Medicaid restrictions, forming a "double lock" mechanism that greatly increases the difficulty for low-income people to maintain any form of social security156156156156.

18. North Carolina 157

* **Status:** No waivers / Risk of county fiscal collapse 158
* **Fiscal Crisis:** North Carolina mandates that the non-federal share of SNAP administrative costs be borne entirely by counties (100%)159159159159. After the OBBBA lowered the federal reimbursement rate to 25%, this means North Carolina counties must bear 75% of administrative expenses160160160160. This is a devastating blow to poor rural counties161161161161.

19. Nebraska 162

* **Status:** Early implementation 163
* **Implementation:** Nebraska voluntarily implemented the new rules on October 20, 2025, before the federal deadline, and enforced the eligibility revocation clauses for non-citizens (Alien Eligibility) particularly strictly164164164164.

20. Tennessee 165

* **Status:** Pioneer 166
* **Implementation:** Before the OBBBA came into mandatory effect, Tennessee had already raised the work requirement age to 64 and tightened caregiver exemptions167167167167.

21-28. Other Southern States (SC, AL, MS, AR, KY, LA, VA, OK) 168

* **Status:** No waivers / Program cuts 169
* **Kentucky & Louisiana:** Announced cuts to SNAP-Ed (nutrition education) programs due to OBBBA funding reductions170170170170.
* **Mississippi:** As one of the poorest states, due to the inability to meet the 10% unemployment waiver standard, its vulnerable groups will face the harshest survival test171.
* **Virginia:** Similar to North Carolina, facing the challenge of county-level administrative cost sharing172.

**Group 4: The Exceptions & The West** 173

29. Alaska 174

* **Status:** Enjoys special waiver rights 175
* **Mechanism:** The OBBBA retained special provisions for non-contiguous states, allowing Alaska to apply for waivers when the unemployment rate reaches 150% of the national average176176176. This allows Alaska to continue exempting its vast remote census areas, as requiring "20 hours of work per week" is unrealistic in these areas that rely solely on subsistence177.

30. Hawaii 178

* **Status:** Enjoys special waiver / Partial transition 179
* **Mechanism:** Also applies the 150% rule180.
* **Challenges:** Despite geographic waivers, Hawaii still needs to implement new age limits for the 18-64 population and cancel statutory exemptions for the homeless181181. It is estimated that about 16,000 residents aged 55-64 will be affected182182182182.

31. Arizona 183

* **Status:** No waivers / Critical zone for Indian exemption 184
* **Focus:** Possesses a large Navajo Nation population185. The "Indian" exemption clause added by the OBBBA is crucial here, but the state government faces the administrative difficulty of how to quickly verify IHS eligibility186.

32. New Mexico 187

* **Status:** No waivers / High poverty rate 188
* **Analysis:** Despite extremely high poverty rates, its unemployment statistics often fail to break the 10% threshold, causing the state to lose its protective umbrella189.

33. Colorado 190

* **Status:** No waivers / Medical system ripple effects 191
* **Impact:** A Colorado hospital has laid off 5% of its staff in anticipation of federal funding cuts brought by the OBBBA192192192192. This indicates that SNAP cuts are rippling into the broader healthcare economy193193193193.

34. North Dakota 194

* **Status:** Full state burden 195
* **Specifics:** North Dakota is one of the few states where the state government fully bears SNAP administrative costs (not passing them to counties)196196. With the federal share dropping to 25%, the state legislature will face huge pressure to add to the budget197197197197.

35-50. Other Western & Plains States (OR, NV, UT, ID, MT, WY, SD, IA, MO, KS, MN, IN) 198

* **Oregon (OR):** Lost waivers based on the 20% rule, struggling to expand job training programs199.
* **Nevada (NV):** Fluctuations in service industry hours lead to massive "churn," where eligible people are kicked out of the system due to insufficient hours in a given month200.
* **Kansas (KS):** Legal conflict occurred between the Attorney General and the Governor over data submission to the federal government, leading to administrative friction201201201201.
* **Idaho (ID):** Passed HB 345, mimicking OBBBA restrictions at the state level202202202202.

### 5.

Structural Impact and Future Outlook 203

**5.1 Failure of the Automatic Stabilizer** 204

The most profound impact of the OBBBA is its destruction of SNAP's function as an automatic economic stabilizer205. By setting a 10% unemployment waiver threshold, the Act ensures that during ordinary economic recessions (where unemployment typically rises to 6-8%), SNAP cannot expand to cover the unemployed population206. Conversely, in the next recession, the unemployed will be kicked out of the welfare system after 3 months, which will lead to a further contraction in aggregate demand, thereby exacerbating the recession207.

**5.2 Administrative "Death Spiral"** 208

Passing 75% of administrative costs to states creates a "death spiral" for state welfare agencies209:

1. State governments cannot afford high administrative expenses and are forced to cut review staff210.
2. Staff shortages lead to case backlogs and rising error rates211.
3. High error rates trigger the OBBBA's "benefit cost sharing" penalty mechanism212212212212.
4. Facing fines, state governments are forced to adopt automated denial systems, lowering error rates at the expense of eligible individuals213.

**5.3 Health Crisis for the 55-64 Age Group** 214

Raising the ABAWD age limit to 64 ignores the health reality of low-income people in this age group215. Many people at this age suffer from undiagnosed chronic diseases (arthritis, diabetes, etc.); while insufficient to qualify for SSDI (Disability Insurance), they are unable to perform heavy physical labor216. The OBBBA effectively pushes this "quasi-disabled" population into the abyss of zero income217.

### 6.

Conclusion 218

The "One Big Beautiful Bill Act of 2025" is not just a budget bill; it is a rewriting of the American social contract219. By eliminating the flexibility of geographic waivers and implementing harsh age and identity restrictions, the federal government has effectively transformed SNAP from a national program aimed at eliminating hunger into a punitive mechanism oriented towards the labor market220.

The map of the United States in late 2025 is a fractured puzzle: Blue states are fighting in court, attempting to use state funds to fill the vacuum left by the federal retreat; Red states are accelerating the advancement of new regulations, viewing them as a victory for fiscal discipline221. However, for millions of affected low-income people across the nation—whether urban poor in California, coal miners in West Virginia, or immigrant families in New York—the winter brought by the OBBBA has just begun222.

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## 1. 引言：范式转变与联邦主义的终结

2025年7月4日，随着第119-21号公法，即《2025年One Big Beautiful Bill Act》（以下简称“OBBBA”或“该法案”）的签署生效，美国的社会福利政策经历了自1996年福利改革以来最为剧烈的结构性震荡 1。虽然该法案在名义上是一项通过预算协调程序（Reconciliation Process）通过的综合性税收与支出法案，但其核心条款对“补充营养援助计划”（SNAP）进行了根本性的重构 3。

本报告旨在提供一份详尽、专家级的政策分析，深入探讨OBBBA如何通过修改受抚养人定义、提高工作要求年龄上限、废除弱势群体豁免权以及重塑联邦-州财政分担机制，从而终结了SNAP作为反周期经济稳定器的历史角色。特别是在“身体健全无受抚养人成年人”（ABAWD）政策领域，联邦政府引入的“10%失业率规则”几乎抹杀了各州根据地方经济状况申请豁免的权力，导致全美50个州的政策实施出现了前所未有的混乱与分化。

截至2025年深秋，随着联邦政府停摆危机的解除与诉讼潮的爆发，一个碎片化的国家安全网图景已然浮现：一部分州（如马萨诸塞州、加利福尼亚州）选择在法庭上对抗联邦农业部（USDA）的行政指令；另一部分州（如得克萨斯州、佛罗里达州）则迅速推进严苛的合规措施；而处于中间地带的“铁锈地带”各州（如密歇根州、宾夕法尼亚州）则在失去豁免权后，面临着行政成本激增与弱势群体福利断崖的双重打击。

## 2. 立法架构与政策逻辑：OBBBA的核心机制分析

OBBBA并非简单的预算削减，它代表了一种根本性的哲学转变——将SNAP从一种基于需求的“权利”（Entitlement）转变为基于劳动力市场参与的“有条件福利”。国会预算办公室（CBO）预计，仅营养条款的变更就将在2025至2034年间减少约1870亿美元的联邦支出 4。

### 2.1 ABAWD定义的激进扩张与豁免权的废除

OBBBA第10102条对ABAWD人群的定义进行了三十年来最显著的扩张。此前，工作要求的适用年龄上限为54岁（根据2023年《财政责任法案》逐步实施）。OBBBA将这一上限直接推高至64岁 1。这意味着，55岁至64岁这一往往面临慢性健康问题、数字鸿沟以及再就业歧视的群体，现在必须每月满足80小时的工作或培训要求，否则将在每36个月内仅能领取3个月的福利。

更为严苛的是对“受抚养人”定义的收窄。在旧法下，只要家庭中有18岁以下的儿童，成年人即可豁免ABAWD规则。OBBBA将这一年龄门槛降至14岁 1。这一变动产生的连锁反应是巨大的：一位抚养15岁高中生的单亲母亲，此前被视为看护者而豁免，现在则被重新分类为ABAWD，必须在照顾青少年的同时寻找全职工作。

**表 2.1：ABAWD政策核心变更对比**

|  |  |  |  |
| --- | --- | --- | --- |
| **政策维度** | **OBBBA实施前（旧法）** | **OBBBA实施后（新法，2025年11月全面生效）** | **政策影响分析** |
| **年龄范围** | 18 - 54岁 | **18 - 64岁** 1 | 将工作要求扩展至接近退休年龄的群体，健康筛查负担激增。 |
| **受抚养儿童年龄** | 18岁以下 | **14岁以下** 1 | 拥有14-17岁子女的父母不再自动豁免，忽视了青少年看护需求。 |
| **退伍军人豁免** | 法定豁免 | **豁免废除** 1 | 曾服务国家的低收入群体失去保护，需重新进行残疾认证。 |
| **无家可归者豁免** | 法定豁免 | **豁免废除** 1 | 对无固定住址者要求工时记录，行政上极难执行。 |
| **寄养青年豁免** | 24岁以下豁免 | **豁免废除** 1 | 刚离开寄养体系的青年面临立即丧失福利的风险。 |
| **原住民豁免** | 无特定条款 | **新增豁免** 1 | 针对IHCIA定义的印第安人提供豁免，但验证机制复杂。 |

### 2.2 “10%规则”：豁免机制的数学性终结

OBBBA第10003条对各州申请豁免工作要求的权利进行了毁灭性打击。此前，如果一个地区的失业率比全国平均水平高出20%（通常约为4.5%-5%），州政府即可申请豁免。这为经济萧条地区提供了重要的缓冲。

OBBBA废除了“工作岗位不足”这一模糊标准，并引入了硬性的\*\*“10%失业率门槛”\*\* 1。根据新规，除非该地区的失业率超过10%，否则不得授予豁免。

* **统计学上的不可能：** 在现代美国经济中，即使是深陷衰退的地区，其官方失业率也很难持续维持在10%以上。例如，在2025年大多数时间里，即便是“铁锈地带”最萧条的县，失业率也往往徘徊在6%-8%之间。设定10%的门槛，实质上是在全国范围内（除极少数例外）永久性地禁止了豁免权。
* **阿拉斯加与夏威夷例外条款：** 考虑到非毗连州的特殊性，法案允许阿拉斯加和夏威夷在失业率达到全国平均水平150%时申请豁免 1。这种基于地理位置的双重标准，已成为当前法律诉讼中关于“平权条款”违宪审查的焦点。

### 2.3 财政联邦主义的重构：行政成本转嫁

除了福利资格的收紧，OBBBA还从根本上改变了SNAP的资金结构，实施了大规模的成本转嫁：

1. **行政成本分担（第10106条）：** 自2027财年起，联邦政府对州级行政成本的报销比例将从50%削减至25%，迫使各州承担75%的运营成本 1。这对于那些财政原本就捉襟见肘的州来说，是一个巨大的“财政悬崖”。
2. **福利成本分担（第10105条）：** 自2028财年起，如果各州的支付错误率（Payment Error Rate）超过6%，州政府将被迫分担一部分实际发放的福利金成本 11。这一机制创造了一个反向激励：为了避免“多发”导致的罚款，各州可能会倾向于在资格审查中采取更为保守、甚至苛刻的态度，从而导致合规的申请人被错误拒绝。

## 3. 执行危机与司法对抗：2025年秋季的混乱

OBBBA的实施并非一帆风顺。2025年10月的联邦政府停摆，加上特朗普政府试图利用新法案扣留11月份SNAP福利的举动，引发了宪政层面的危机。

### 3.1 “扣留”危机与《马萨诸塞州诉美国农业部案》

2025年10月，随着OBBBA各项条款即将生效，联邦政府因预算僵局陷入停摆。特朗普政府依据OBBBA的精神，试图不仅暂停行政拨款，甚至计划扣留11月份的福利发放，理由是第32条款资金（Section 32 funds）不应用于填补缺口 13。

这一举动立即引发了以马萨诸塞州为首的26个州的联合诉讼（*Massachusetts v. USDA*）14。原告州指控联邦政府违反了《扣留控制法》（Impoundment Control Act）和宪法中的“忠实执行”条款。罗德岛联邦地方法院对此案做出了迅速反应，法官John J. McConnell Jr.发布了临时限制令（TRO），严厉谴责行政当局“出于政治原因”扣留食品福利，并强制要求全额发放11月份的福利 16。虽然福利最终得以发放，但这一事件彻底破坏了联邦与各州在SNAP管理上的信任基础。

### 3.2 豁免权的追溯性终止与《加利福尼亚州诉美国农业部案》

与此同时，加利福尼亚州在另一个战场发起了反击。USDA发布指导备忘录，宣布依据OBBBA的新标准，所有现存的ABAWD豁免权将于2025年11月1日自动终止，无论其原定的过期时间为何 18。加州认为这种追溯性的终止违反了《行政程序法》（APA），因为它没有给各州留出足够的时间来调整行政系统或通知受影响的数百万人 19。

尽管加州申请了初步禁令，但最高法院在相关案件中的态度表明，司法系统可能倾向于允许行政部门执行国会的明确立法意图，即便这种执行过程显得仓促和混乱 20。这导致加州不得不一边诉讼，一边在混乱中准备实施新规。

## 4. 全美50州政策实施状态深度分析（2025-2026）

基于OBBBA的法律框架及随后的司法斗争，全美各州的SNAP/ABAWD政策在2025年末呈现出极度的分化。我们将各州分为五大类进行详细剖析：**司法抵抗区**（积极诉讼且试图维持原有政策）、**被迫转型区**（失去豁免权且面临行政崩溃）、**快速合规区**（主动采纳严苛标准）、**特殊例外区**（阿拉斯加与夏威夷）以及**完全执行区**（无豁免权且全面执行）。

### 第一组：司法抵抗区（The Judicial Resistance）

这一组别的州通常由民主党执政，拥有庞大的社会福利体系，OBBBA对其造成的行政和财政冲击最为剧烈。它们选择通过法律手段延缓政策执行，并利用州级资金进行填补。

#### 1. 加利福尼亚州 (California)

* **状态：** **部分豁免被撤销 / 激烈诉讼中 / 实施印第安豁免**
* **豁免现状：** 加州原本拥有覆盖全州的ABAWD豁免权，该豁免原定持续至2026年。然而，根据OBBBA，该全州豁免被强制终止。截至2025年11月1日，USDA仅批准了**科卢萨县 (Colusa)、因皮里尔县 (Imperial) 和图莱里县 (Tulare)** 的豁免申请，因为只有这些地区的失业率勉强达到了新标准 21。
* **政策响应：** 纽森州长指示社会服务部（CDSS）最大限度地利用OBBBA中新增的“印第安人”豁免条款。由于加州拥有庞大的城市印第安人口，州政府正试图通过与印第安卫生局（IHS）合作，将尽可能多的受助者归类为豁免人群。然而，验证过程极其繁琐。
* **财政影响：** 预计因时间限制到期，加州将损失约4.99亿美元的联邦食品资金。此外，州政府已加入多州诉讼，指控联邦扣留资金的行为违法 20。

#### 2. 纽约州 (New York)

* **状态：** **豁免终止 / 预期行政混乱 / 法律援助介入**
* **豁免现状：** 纽约州的ABAWD豁免权于2025年11月正式终结。自12月起，包括纽约市在内的全州范围将首次全面实施严格的工作要求 23。
* **具体影响：** 纽约市（NYC）估计有约10万名ABAWD将被迫在短时间内寻找工作或参加培训。由于纽约市人口结构复杂，社会服务局（DSS）正面临巨大的行政挑战，需要用15种语言发送数百万份合规通知 19。
* **法律行动：** 法律援助协会（Legal Aid Society）和城市正义中心（Urban Justice Center）已起诉USDA，指控其提前终止豁免权导致了“无法操作”的行政负担。纽约州也是行政成本分担新规的最大受害者之一，因为该州的SNAP行政由各县负责，75%的成本转嫁将导致各县财政崩溃 12。

#### 3. 马萨诸塞州 (Massachusetts)

* **状态：** **诉讼领头羊 / 严格执行10%规则**
* **豁免现状：** 在OBBBA之前，马萨诸塞州利用“就业岗位不足”标准豁免了许多地区。现在，由于没有任何地区的失业率超过10%，**全州无一幸免**，所有ABAWD都必须遵守工作要求 24。
* **政策响应：** 作为*Massachusetts v. USDA*案的主要原告，该州总检察长不仅挑战资金扣留，还攻击OBBBA的合宪性。州过渡援助部（DTA）正在向18-64岁的人群发送警告信，并试图扩展州级就业培训项目（SNAP E&T）的容量以容纳激增的需求 25。

#### 4. 华盛顿州 (Washington)

* **状态：** **豁免被全面撤销 / 州长介入**
* **豁免现状：** 华盛顿州此前有38个县享有豁免。但在2025年11月3日，所有豁免被USDA依据OBBBA撤销，目前全州没有任何FNS批准的豁免区 26。
* **政策响应：** 州长鲍勃·弗格森（Bob Ferguson）发表声明，庆祝法院强制发放11月福利的判决，但也承认ABAWD时间限制的未来“充满不确定性” 16。州社会与卫生服务部（DSHS）正在紧急更新36个月的计数周期，警告所有非豁免区的ABAWD必须立即满足工作要求 27。

#### 5. 伊利诺伊州 (Illinois)

* **状态：** **豁免完全丧失 / 预算危机 / 行政命令**
* **豁免现状：** 伊利诺伊州的豁免于2025年11月结束。根据新规，**伊利诺伊州没有任何一个县的失业率超过10%**，因此无法申请任何地理豁免 28。
* **具体影响：** ABAWD人口从约18.9万瞬间激增至44.6万。州政府估计，约34万人面临失去福利的风险，其中包括2.3万名此前被豁免的无家可归者和退伍军人 28。
* **政策响应：** 普利兹克州长发布行政命令，谴责联邦政府的行为，并指示州公共服务部（IDHS）寻找一切可能的行政手段减少影响，例如通过医疗筛查扩大残疾豁免的适用范围 29。

### 第二组：被迫转型区（The Displaced / Rust Belt）

这一组别的州多为“铁锈地带”或工业衰退区。虽然当地存在真实的经济困境，但官方失业率未能达到OBBBA设定的10%极端门槛，导致它们失去了原本的保护伞。

#### 6. 密歇根州 (Michigan)

* **状态：** **豁免极度缩减 / 奥斯科达例外**
* **豁免现状：** 密歇根州原本有广泛的豁免区。但在OBBBA规则下，全州仅有**奥斯科达县 (Oscoda County)** 一个地区因失业率超过10%而保住了豁免权 30。
* **影响分析：** 韦恩县（底特律）和杰纳西县（弗林特）等长期贫困地区因失业率统计数据未达标而失去了保护。这是一个典型的“统计陷阱”案例——OBBBA无视了结构性贫困，只看单一的失业率指标 31。

#### 7. 宾夕法尼亚州 (Pennsylvania)

* **状态：** **豁免丧失 / 64岁规则全面实施**
* **豁免现状：** 宾夕法尼亚州公共服务部明确表示，由于联邦法律的变更，该州“不再有资格根据县或市辖区申请豁免” 32。
* **实施细节：** 该州自2025年9月1日起就开始分阶段实施新规，至11月1日，所有18-64岁的ABAWD都被纳入时间限制系统。这意味着该州庞大的农村贫困人口现在必须在就业机会稀缺的地区寻找每周20小时的工作。

#### 8. 俄亥俄州 (Ohio)

* **状态：** **无豁免 / 县级财政压力**
* **特殊性：** 俄亥俄州是实行县级管理的州（County-administered）。随着OBBBA将行政成本分担比例提高到75%，俄亥俄州的各个县将面临巨大的财政压力，可能导致就业和家庭服务（JFS）办公室裁员，进而加剧福利审批的积压和错误率 12。

#### 9. 新泽西州 (New Jersey)

* **状态：** **申请被拒 / 依赖志愿服务**
* **豁免现状：** 新泽西州曾申请在2025年2月至2026年1月期间豁免20个县，但鉴于失业率数据，这一申请在OBBBA框架下几乎注定失败 33。
* **应对措施：** 州政府正在大力推广“志愿服务”作为满足80小时要求的途径，但当地非营利组织反馈称，它们没有能力为如此多的人提供合规的志愿岗位 34。

#### 10. 威斯康星州 (Wisconsin)

* **状态：** **无豁免 / 成本分担压力**
* **影响：** 作为县级管理州，威斯康星州的各县将承担新增的行政成本。州立法机构倾向于支持工作要求，因此州层面的抵抗较少，但基层执行层面的资金缺口巨大。

#### 11. 康涅狄格州 (Connecticut)

* **状态：** **无豁免**
* **分析：** 富裕郊区拉低了全州失业率，使得布里奇波特（Bridgeport）和哈特福德（Hartford）等贫困城市的居民无法获得豁免。

#### 12-14. 缅因州、佛蒙特州、新罕布什尔州 (Maine, Vermont, New Hampshire)

* **状态：** **无豁免 / 老龄化冲击**
* **分析：** 这些州拥有较高比例的老年劳动力。将工作要求年龄上限从54岁提高到64岁，对这些州农村地区的低收入老年人造成了直接冲击。

### 第三组：快速合规区（The Compliant / The South）

这一组别的州（主要在南部和中西部）在政治上倾向于支持更严格的福利限制。它们不仅迅速实施了OBBBA的规定，部分州甚至主动采取了比联邦要求更为激进的措施。

#### 15. 得克萨斯州 (Texas)

* **状态：** **严格执法 / 拒绝夏季EBT**
* **实施：** 得州对18-64岁人群的工作要求执行得非常彻底。州政府特别强调，现在拥有15、16、17岁子女的父母也必须工作，不再享有豁免 35。
* **政治姿态：** 得州以担心OBBBA带来的未来州级财政义务为由，选择退出了联邦的“夏季EBT”计划（Summer EBT），显示出该州在削减福利支出方面的强硬立场 36。

#### 16. 佛罗里达州 (Florida)

* **状态：** **无豁免 / 季节性工人的噩梦**
* **分析：** 佛罗里达州的旅游业经济具有高度季节性。ABAWD的三个月时间限制意味着，在旅游淡季无法获得足够工时的数万名服务业工人，将周期性地失去SNAP福利资格 4。

#### 17. 佐治亚州 (Georgia)

* **状态：** **双重锁定（Medicaid + SNAP）**
* **特殊性：** 佐治亚州是唯一一个同时实施Medicaid工作要求的州 37。OBBBA的SNAP新规与该州现有的Medicaid限制相互叠加，形成了一个“双重锁定”机制，极大地增加了低收入人群维持任何形式社会保障的难度。

#### 18. 北卡罗来纳州 (North Carolina)

* **状态：** **无豁免 / 县级财政崩溃风险**
* **财政危机：** 北卡罗来纳州规定，SNAP行政成本的非联邦份额完全由各县承担（100%）。OBBBA将联邦报销比例降至25%后，意味着北卡的各县必须承担75%的行政费用。这对于贫困的农村县来说是毁灭性的打击 12。

#### 19. 内布拉斯加州 (Nebraska)

* **状态：** **提前实施**
* **实施：** 内布拉斯加州在联邦截止日期前的2025年10月20日就主动实施了新规，并特别严格地执行了针对非公民（Alien Eligibility）的资格剥夺条款 2。

#### 20. 田纳西州 (Tennessee)

* **状态：** **先行者**
* **实施：** 田纳西州在OBBBA强制生效前，就已将工作要求年龄提高至64岁，并收紧了看护者豁免 36。

#### 21-28. 南方其他州 (SC, AL, MS, AR, KY, LA, VA, OK)

* **状态：** **无豁免 / 项目削减**
* **肯塔基州与路易斯安那州：** 已宣布因OBBBA的资金削减而缩减SNAP-Ed（营养教育）项目 36。
* **密西西比州：** 作为全美最贫困的州之一，由于无法满足10%的失业率豁免标准，其弱势群体将面临最严酷的生存考验。
* **弗吉尼亚州：** 与北卡类似，面临县级行政成本分担的挑战。

### 第四组：特殊例外区与西部各州（The Exceptions & The West）

#### 29. 阿拉斯加州 (Alaska)

* **状态：** **享有特殊豁免权**
* **机制：** OBBBA保留了针对非毗连州的特殊条款，允许阿拉斯加在失业率达到全国平均水平150%时申请豁免 1。这使得阿拉斯加能够继续豁免其广大的偏远普查区，因为在这些仅靠维持生计（subsistence）的地区，要求“每周工作20小时”是不现实的。

#### 30. 夏威夷州 (Hawaii)

* **状态：** **享有特殊豁免 / 部分转型**
* **机制：** 同样适用150%规则。
* **挑战：** 尽管有地理豁免，夏威夷州仍需对18-64岁的人群实施新的年龄限制，并取消无家可归者的法定豁免。据估计，约1.6万名55-64岁的居民将受到影响 38。

#### 31. 亚利桑那州 (Arizona)

* **状态：** **无豁免 / 印第安豁免关键区**
* **焦点：** 拥有庞大的纳瓦霍族（Navajo Nation）人口。OBBBA新增的“印第安人”豁免条款在此至关重要，但州政府面临着如何快速验证IHS资格的行政难题。

#### 32. 新墨西哥州 (New Mexico)

* **状态：** **无豁免 / 高贫困率**
* **分析：** 尽管贫困率极高，但其失业率统计数据往往无法突破10%的门槛，导致该州失去了保护伞。

#### 33. 科罗拉多州 (Colorado)

* **状态：** **无豁免 / 医疗系统连锁反应**
* **影响：** 一家科罗拉多医院因预见到OBBBA带来的联邦资金削减，已裁员5% 36。这表明SNAP的削减正在波及更广泛的医疗卫生经济。

#### 34. 北达科他州 (North Dakota)

* **状态：** **州级全额负担**
* **特殊性：** 北达科他州是少数几个由州政府全额承担SNAP行政成本（不转嫁给县）的州之一。随着联邦分担比例降至25%，州议会将面临巨大的预算追加压力 12。

#### 35-50. 其他西部与平原州 (OR, NV, UT, ID, MT, WY, SD, IA, MO, KS, MN, IN)

* **俄勒冈州 (OR)：** 失去了基于20%规则的豁免，正努力扩大就业培训项目。
* **内华达州 (NV)：** 服务业工人的工时波动导致大量“搅动”（Churn），即符合资格的人因某个月工时不足而被踢出系统。
* **堪萨斯州 (KS)：** 总检察长与州长在向联邦提交数据问题上发生法律冲突，导致行政内耗 39。
* **爱达荷州 (ID)：** 通过了HB 345法案，在州级层面模仿OBBBA的限制措施 40。

## 5. 结构性影响与未来展望

### 5.1 自动稳定器的失效

OBBBA最深远的影响在于它破坏了SNAP作为经济自动稳定器的功能。通过设定10%的失业率豁免门槛，法案确保了在普通的经济衰退（失业率通常升至6-8%）期间，SNAP无法扩张以覆盖失业人口。相反，在下一次经济衰退中，失业者将在3个月后被踢出福利系统，这将导致总需求的进一步收缩，从而加剧衰退。

### 5.2 行政“死亡螺旋”

将行政成本的75%转嫁给各州，为各州福利机构制造了一个“死亡螺旋”：

1. 州政府无力承担高昂的行政费用，被迫裁减审核人员。
2. 人员短缺导致案件积压和错误率上升。
3. 高错误率触发OBBBA的“福利成本分担”罚款机制 11。
4. 面临罚款的州政府被迫采取自动化拒绝系统，以牺牲合格者的利益为代价来降低错误率。

### 5.3 55-64岁群体的健康危机

将ABAWD年龄上限提高至64岁，忽视了该年龄段低收入人群的健康现实。许多人在这个年龄患有未确诊的慢性病（关节炎、糖尿病等），虽然不足以获得SSDI（残疾保险），但也无法从事重体力劳动。OBBBA实际上将这部分“准残疾”人群推向了零收入的深渊。

## 6. 结论

《2025年One Big Beautiful Bill Act》不仅是一项预算法案，更是一次对美国社会契约的重写。通过消除地理豁免的灵活性并实施严苛的年龄与身份限制，联邦政府已有效地将SNAP从一个旨在消除饥饿的国家项目，转变为一个以劳动力市场为导向的惩罚性机制。

2025年末的美国地图是一个分裂的拼图：蓝色州在法庭上抗争，试图用州级资金填补联邦撤退留下的真空；红色州则在加速推进新规，将其视为财政纪律的胜利。然而，对于全美数百万受影响的低收入者——无论是加州的城市贫民、西弗吉尼亚的煤矿工人，还是纽约的移民家庭——OBBBA带来的寒冬才刚刚开始。