

# POLICY BRIEF

## HF 2608 is Unnecessary, Costly, and Harmful



HF 2608 would require all non-citizen applicants for public assistance programs in the state of Iowa to be verified through the Systematic Verification for Entitlements (SAVE) program administered by the United States Department of Homeland Security (DHS) and add a vague “smuggling” provision to criminal code.

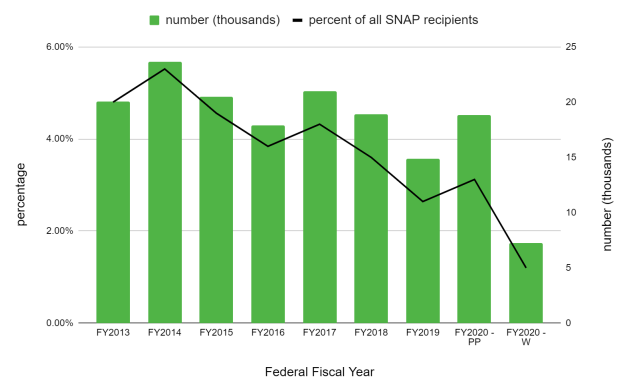
### HF 2608 would add unnecessary barriers to access public assistance while increasing costs to the state.

- Iowa already utilizes the SAVE system to verify non-citizen status for public assistance programs— Supplemental Nutrition Assistance Program (SNAP)<sup>1</sup>, Family Investment Program (FIP/TANF)<sup>2</sup>, Hawk-i<sup>3</sup>, and Medicaid<sup>4</sup>—when it cannot be verified by other authorized means.
- While SAVE can produce results quickly, that is not always the case. The additional verification response time for SAVE is seven federal workdays<sup>5</sup>, and in some cases, can take 10-20 federal workdays<sup>6</sup>. When Iowa is already severely out of compliance with federal requirements related to SNAP application processing timeliness<sup>7</sup>, we cannot afford to create additional hurdles and delays.
- Using the SAVE system can be costly to states. In FY 2024, the non-federal agency charge per verification case for SAVE was \$1.00, but that is set to triple to \$3.10 per case by FY 2028<sup>8</sup>.
- The fiscal note for HF 2608 does *not* include ongoing costs to the state for utilizing the SAVE system, but does estimate total one-time setup costs of \$92,411, with Iowa covering \$29,487 of the cost<sup>9</sup>.

### The bill would further chill participation in public assistance programs in mixed-status households.

- SNAP participation among eligible citizen children living with a non-citizen has fallen considerably in the last few years<sup>10</sup>, especially following the “public charge” final rule announcement in August 2019 (which was later reversed in September 2022).
- HF 2608 reinforces harmful anti-immigrant rhetoric that may prevent mixed-status households from enrolling eligible children in SNAP and other public assistance programs.

Citizen children living with a non-citizen as a share of total SNAP recipients in the state of Iowa



1. *Employee Manual, Title 7, Chapter I: "SNAP Specific Households and Participants."* State of Iowa Department of Health and Human Services. October 21, 2022.
2. *Employee Manual, Title 4, Chapter L: "Family Investment Program Aliens and Migrants."* State of Iowa Department of Health and Human Services. November 4, 2022.
3. *Employee Manual, Title 5, Chapter E: "Healthy and Well Kids in Iowa (hawk-i) - Nonfinancial Eligibility Factors."* State of Iowa Department of Health and Human Services. July 3, 2009.
4. *Employee Manual, Title 8, Chapter L: "Medicaid Aliens."* State of Iowa Department of Health and Human Services. May 12, 2023.
5. SAVE. US Citizenship and Immigration Services. <https://www.uscis.gov/save>. Accessed January 29, 2024.
6. SAVE Verification Process. Saev Hernandez Immigration Practice. <https://www.shipimmigration.com/save-verification-process/>. Accessed January 29, 2024.
7. SNAP Application Processing Timeliness - Corrective Action Plan Letter to Iowa Department of Health and Human Services. US Department of Agriculture, Food and Nutrition Service, Midwest Regional Office. November 21, 2023.
8. SAVE Transaction Charges. US Citizenship and Immigration Services. <https://www.uscis.gov/save/about-save/save-transaction-charges>. Accessed January 29, 2024.
9. HF 2608 Fiscal Note. Legislative Services Agency. <https://www.legis.iowa.gov/docs/publications/FN/1447082.pdf>
10. *Characteristics of SNAP Households: FY 2020 and Early Months of the COVID 19 Pandemic.* U.S. Department of Agriculture, Food and Nutrition Service. June 2022.