



November 3, 2025

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

Patrick A. Penn
Deputy Under Secretary
Food and Nutrition Service
U.S. Department of Agriculture
1400 Independence Avenue SW
Washington, D.C. 20250

Re: Issuance of Partial SNAP Benefits

Dear Secretary Rollins and Deputy Under Secretary Penn,

On behalf of the American Public Human Services Association (APHSA), we wish to express our appreciation for the tremendous undertaking before you and your colleagues at the Food and Nutrition Service (FNS) as you support states in issuing partial Supplemental Nutrition Assistance Program (SNAP) benefits for the month of November. We value our longstanding partnership and stand ready to assist as we pursue our shared goal of ensuring households receive vital food assistance as swiftly and efficiently as possible.

We anticipate that forthcoming guidance—consistent with 7 CFR 271.7—will require states to modify their eligibility systems to reflect the reduced maximum allotments. During today's APHSA call with state leaders, we heard both strong commitment to supporting this transition and concern about the potential administrative challenges that could cause delays, errors, and complicate future system reversions once normal operations resume. We also ask that you fully consider the use of targeted regulatory waivers, where appropriate, to mitigate against increased errors or delays during these

unprecedented times. To support our mutual objective of timely and accurate benefit delivery, we welcome the opportunity to work collaboratively with your team on practical implementation strategies.

We also recognize that the process of issuing partial benefits may create short-term operational challenges during a critical period when states are intently focused on mitigating programmatic risks. In this extraordinary situation, we strongly encourage FNS to extend the hold harmless period to allow states the necessary time and flexibility to comply with new directives while continuing to safeguard program integrity.

Thank you, both, for your leadership as we navigate this partial restoration of November benefits in alignment with the provisions of HR 1. APHSA remains committed to working closely with USDA and FNS to ensure a seamless process that best serves families across the nation.

Sincerely,



Reggie Bicha
President & CEO