

October 17, 2025

Patrick Penn  
Deputy Under Secretary  
USDA Food, Nutrition, and Consumer Services  
1320 Braddock Place  
Alexandria, VA 22314

RE: State SNAP Agency Requests in Response to the Lapse in Government Funding

Dear Deputy Under Secretary Penn,

On behalf of the members of the American Public Human Services Association (APHSA), I am writing to seek clear information about how to proceed with ongoing October applications, November benefits, and regular Supplemental Nutrition Assistance Program (SNAP) operations in lieu of the ongoing federal government shutdown. As you know, SNAP provides critical food and nutrition services to millions of Americans every day and serves as a key stimulant to local economies. Our members in state, county, and city human services agencies are committed to being good stewards of public resources and ensuring that SNAP operates with integrity and accountability, both to the federal government and to the individuals and families the program serves. As of this week, state agencies are in a particularly difficult position as they work to uphold those responsibilities. While we understand the significant limitations caused by the lapse in appropriations, states wish to actively coordinate with FNS as we are mutually accountable for planning ahead to strengthen system integrity, provide accurate information to customers, and ensure readiness for any required action once funding is restored.

### **Operational Uncertainty and Immediate Needs**

In the October 10th memo from FNS to state agencies, states were directed to hold November issuance files and delay transmission to their EBT vendors until further notice. This direction was important to ensure program flexibility, but it has also created a number of complex operational questions that states must resolve soon to meet their planning and system deadlines.

States need additional clarity on key issues such as:

- Whether and how to process **combined issuances** for individuals authorized for benefits spanning mid-late October and how states should process if they cannot separate benefits for October and November;
- How to manage **expedited cases** and **daily issuance files**, and whether those instructions apply throughout October or only later in the month;
- Expectations for **continued certification, recertification, work requirement reporting, and claims processes** if November benefits cannot yet be issued; and
- Specific clarification around their ability to **spend and be reimbursed for their ongoing administrative costs** and program costs such as SNAP Employment & Training and SNAP Outreach.

States are working diligently to plan responsibly and consistently throughout this government shutdown. During previous shutdowns, FNS has provided interpretations regarding contingency guidance. However, our members wish to avoid errors or assumptions based on guidance from prior years. This can be achieved with timely and renewed federal policy clarification provided by this administration.

### **Preserving Program Access**

States also request that FNS work together with EBT processors to ensure that SNAP retailers will not be deauthorized in November should appropriations remain lapsed. Deauthorization could create additional confusion and hardship for both households and retailers. It could also affect other programs that use the same EBT infrastructure, such as TANF and other forms of state-funded assistance. Keeping retailers authorized would also allow those with existing benefits on the EBT cards to continue to use them, states to make the decision to continue to fund benefits using state-only resources, and for the program to remain ready to resume full operations once funding is reinstated.

### **Supporting Ongoing SNAP Policy Implementation**

Additionally, states are continuing to implement and train staff on the significant policy changes that were passed earlier this summer, including new and improved strategies to strengthen payment accuracy. With the uncertainty surrounding the lapse in funding and how long it may continue, there are concerns about potential unintended impacts on payment



error rates as states experience system delays or necessary pauses in key processes. We are requesting that FNS consider additional support and flexibilities that states may need, including the possibility of extending the hold harmless period, to ensure they can continue making progress toward these shared goals of program integrity and effective administration. This request has taken an even more critical level of need as a result of the federal shutdown and the resulting disruption to the SNAP program.

### **Continued Partnership**

APHSA appreciates FNS's partnership and communication during this challenging time, including efforts to develop a Q&A document for states. We encourage FNS to issue clarification as soon as possible to support states in their planning, maintain confidence in program administration, and uphold public trust in SNAP's operations. We also welcome the opportunity to host a call for our members with you and your team, or partner in any other way to jointly support state agencies as they navigate the coming weeks.

Our members remain committed to administering SNAP responsibly and transparently, even under these difficult circumstances. We appreciate your continued collaboration and look forward to working together to ensure states have the guidance and tools they need to manage this period effectively. Should you have questions or want to talk further, please reach out to Chloe Green, Assistant Director, Policy, at [cgreen@aphsa.org](mailto:cgreen@aphsa.org).

Sincerely,

A handwritten signature in blue ink, reading "Reggie Bicha", is positioned above the printed name.

**Reggie Bicha**

President and CEO

American Public Human Services Association

