

Rachel Frisk  
Food, Nutrition, and Consumer Services  
1320 Braddock Place  
Alexandria, VA 22314

March 3, 2025

## **RE: SNAP Program Quality Control Review Handbook Incorporation by Reference Proposed Rule**

Dear Ms. Frisk,

The American Public Human Services Association (APHSA) appreciates the opportunity to submit comments on the *Proposed Rule: SNAP Program Quality Control Review Handbook Incorporation by Reference*. APHSA is the bipartisan, national membership association representing state, county, and city human services agencies responsible for delivering essential programs, including SNAP, and for upholding processes to assure and enhance program integrity. Through our affinity groups—the American Association of SNAP Directors (AASD) and the National Association for Program Information and Performance Measurement (NAPIPM)—we convene SNAP administrators and quality control (QC) leads nationwide. Together, we work to foster data-driven solutions and promote transparent, accountable practices in SNAP administration.

APHSA has long supported the need for increased transparency in the development and implementation of the SNAP QC 310 Handbook, which defines the intricate processes state SNAP agencies must follow to assess program accuracy and assign payment error rates. We greatly appreciate FNS's recognition of the need to acknowledge and shift how the 310 Handbook becomes policy, we do not believe the method of incorporation by reference (IBR) effectively achieves the goal of increasing transparency in how the policies are updated and implemented. Using IBR for the 310 Handbook would fully incorporate the 400+ page document into regulation, without creating any increased opportunity for feedback to the document itself. For this reason, we respectfully oppose the proposed rule as written.

### **Current State of QC 310 Handbook Updates**

The QC 310 Handbook plays a critical role in shaping how states collect and report data related to payment accuracy. However, updates to the Handbook currently occur without formal public review or comment. In practice, FNS typically shares updates with a limited group of state QC administrators for feedback. While this outreach is appreciated, timelines for response are often too short, and broader but essential partners—including

state policy leads, county agencies, state and national associations, advocacy organizations, and SNAP recipients themselves—are excluded from contributing their valuable perspectives.

The absence of structured engagement has already led to harmful outcomes. For example, changes to sections 751 and 752 of the Handbook resulted in thousands of eligible households unfairly and inaccurately losing SNAP benefits and being charged overpayments, and several states facing inflated error rates that could lead to financial penalties, as detailed in [APHSA's July 2023 letter to FNS](#). Although recent corrections will mitigate some of these effects, the impacts have been lasting for both households and state agencies. As new rules with potentially significant implications for QC processes are expected, it is imperative to establish transparent mechanisms for Handbook updates as they will determine the implementation and impacts of any new rules or legislation.

### **Concerns with Incorporation by Reference**

While incorporation by reference (IBR) would elevate the Handbook to the level of regulation, it would not address the fundamental issue of transparency. IBR would grant the Handbook regulatory authority but would not mandate public notice or comment on future changes, which is what APHSA strongly recommends as needed. While we do believe it is important for FNS to have the ability to update guidance in a timely manner, this approach risks perpetuating a system in which updates are made without meaningful input from crucial partners and implementors and creates future risk of policy changes that harm the integrity of the program. Furthermore, based on other documents that have been used in IFR such as industry standards, we believe it is inappropriate to incorporate the full 310 Handbook in this way.

### **Recommendations**

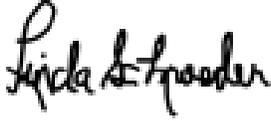
To truly enhance transparency and accountability, APHSA urges FNS to require a formal public comment period of at least 60 days for any significant updates to the QC 310 Handbook. This would ensure that essential partners—including all state agencies, policy leaders, and advocates—have adequate opportunities to provide input on changes that affect SNAP administration and outcomes for participants.

We value FNS's commitment to continuous improvement and welcome the opportunity to collaborate on developing a more effective and inclusive process for updating the Handbook. Please feel free to contact Chloe Green, Manager of Food and Nutrition Services, at [cgreen@aphsa.org](mailto:cgreen@aphsa.org) for further discussion.

Thank you for your efforts to strengthen SNAP and for considering these recommendations.



Sincerely,



**Linda Schroeder**

Chair, American Association of SNAP  
Directors (AASD)

Administrator, Benefits Support Team, Arizona  
Department of Economic Security



**Deborah Doyle**

Chair, National Association of Program  
Information and Performance Measurement  
(NAPIPM)

Director, Division of Program Integrity,  
Washington Department of Social and Health  
Services



**Chloe Green**

Manager, Food and Nutrition Services  
American Public Human Services Association  
(APHSA)

