

November 24, 2025

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

RE: Request for Adjustment to FY 2025 SNAP Quality Control Sample in Response to Shutdown Impacts

Dear Deputy Under Secretary Penn,

On behalf of the American Public Human Services Association (APHSA) and our members in state, county, and city human services agencies, we want to begin by expressing our appreciation for the swift guidance issued following the reopening of the federal government. States were grateful for FNS's confirmation that they will not be penalized for application and recertification timeliness during the shutdown period, as well as the additional flexibilities provided for ABAWD work requirements in November. Both actions are helping state agencies regain stability while resuming core operations.

We recognize this has been a tremendous amount of work for federal and state teams alike. Since the passage of the One Big Beautiful Bill Act (H.R. 1) on July 4, states have been working tirelessly to implement significant new policy changes designed to strengthen payment accuracy, improve program operations, and ensure that eligible households receive the correct benefits at the right time. Even in the midst of the shutdown, states continued dedicating significant staff time, system capacity, and training resources to stay on track with these priorities.

As states work to maintain momentum on these efforts, we respectfully request FNS's partnership in addressing the substantial and unavoidable impacts that the government shutdown period will have on FY 2026 Quality Control (QC) results.

Request for Adjustment to October and November QC Sampling

Given the operational disruptions caused by the shutdown and the delayed guidance that followed, we request that all cases from October and November 2025 be removed from the FY 2026 QC sample, and that the sample size be reduced accordingly under 7 CFR 275.11(b) and (c). We believe there is precedent for this given that FNS also issued variance exclusion for states during the prior shutdown in 2018/2019 for the early February issuances. In this case, many issuances in October and all November issuances were disrupted and, therefore, we believe all cases should be excluded from the sample.

October 2025

As APHSA has previously communicated to FNS, states required clarification by October 15 to process combined allotments for individuals authorized for benefits after this date. However, guidance on this topic was not released until October 24, which meant that states were forced to proceed based on incomplete information, resulting in varied approaches across the country. At minimum, we urge FNS to ensure states are held harmless for any payment errors associated with combined allotments processed during this period.

Additionally, many states report that QC completion rates for October (and open reviews from prior months) may be affected because households contacted in late October and early November were uncertain whether they were receiving benefits at all, leading to increased difficulty completing interviews and obtaining verifications.

November 2025

In early November, states were required to respond to rapidly changing and, at times, conflicting directives resulting from evolving federal guidance, shifting funding authority, and multiple court orders. Within the span of days, states were told to prepare for issuing no benefits, then partial benefits at 50% maximum levels, then 65% maximum levels the next day, then the possibility of full benefits, reaffirmed 65% maximum benefit levels, and then finally full benefits once the government reopened. This meant that states could have issued benefits anywhere from one to three times to the same household for the month of November.

States had never been required to issue partial or incremental benefits mid-month, so their systems and vendor configurations varied in how quickly they could adapt. As a result, states ended up in very different operational positions, with some issuing multiple sequential payments to restore households to the correct amount, while others issued only a single full benefit once systems stabilized. Additionally, to get partial benefits out as quickly as possible, some states elected to utilize manual workarounds rather than waiting weeks to make automated system changes.

Understandably, the uncertain, varying guidance, and need to quickly change course will likely lead to inflated errors for the months of October and November. This variation creates QC data that does not reflect quality and accurate data for normal QC processes, nor does it support a system of fairness and accuracy across states. Having multiple benefits issued to a household in a month also introduces anomalies that can artificially inflate or obscure payment errors in the sample. For these reasons, November cases cannot provide a reliable or comparable basis for QC sampling and should be removed from the FY 2026 QC sample.

Shared Commitment to Program Accuracy and Success

States are in strong alignment with FNS, the Administration, and Congress in the priority to strengthen payment accuracy, reduce improper payments and fraud, and ensure eligible households receive the correct benefits at the right time. These goals carry particularly high stakes this year, as the error rates being calculated now will directly influence future state cost-sharing obligations—and, for some states, their ability to sustain program operations.

Given these stakes, QC findings from the shutdown period should not undermine the significant work states have undertaken since July to implement H.R. 1 and improve accuracy. The disruptions of October and November were outside states' control, and without adjustment, QC results would reflect shutdown-driven operational conditions rather than true eligibility accuracy or program performance.

Removing October and November from the QC sample will give states a fair opportunity to demonstrate real progress toward these shared national goals.

Preparing for Future Disruptions



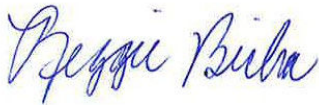
Finally, we appreciate FNS's acknowledgement in recent guidance of the need for states and EBT partners to evaluate and improve system agility in the event of future lapses in funding. APHSA is already convening states and EBT processors to begin identifying practical approaches to strengthen system readiness and minimize disruption should similar situations arise again. We would also welcome the opportunity to partner with FNS on revisiting the regulations that impact states during the shutdown to help ensure they reflect current processes and align with other benefit distribution regulations, as well as to update them based on our lessons learned. In that spirit of partnership, we would be pleased to invite FNS to join us at an upcoming Leadership Council convening—APHSA's forum of state and local human services CEOs responsible for guiding our national policy and practice agenda—to engage directly with leaders across program areas on these shared priorities.

Closing

Thank you for considering this request and for your continued engagement with states during an exceptionally challenging period. APHSA and our members remain committed to working with FNS to ensure that program integrity efforts move forward effectively, accurately, and in alignment with the goals established under H.R. 1.

We welcome further discussion on these recommendations. Please contact Chloe Green, Assistant Director, Policy, at cgreen@aphsa.org with any questions or to continue the conversation.

Sincerely,

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

Reggie Bicha
President & CEO

American Public Human Services Association

