

May 13, 2025

Chairman Glenn 'GT' Thompson House Agriculture Committee 400 Cannon House Office Building Washington, DC 20515

Chairman John Boozman Senate Agriculture Committee 555 Dirksen Senate Office Building Washington, DC 20510 Ranking Member Angie Craig House Agriculture Committee 2052 Rayburn House Office Building Washington, DC 20515

Ranking Member Amy Klobuchar Senate Agriculture Committee 425 Dirksen Senate Office Building Washington, DC 20510

Dear Chairman Thompson, Ranking Member Craig, Chairman Boozman, and Ranking Member Klobuchar,

On behalf of the American Public Human Services Association (APHSA), the national, bipartisan membership association for state and local human services agencies, we are writing to share the potential impacts to state SNAP agencies based on several provisions included in the House Agriculture Committee's draft text for the upcoming Budget Reconciliation related to the Supplemental Nutrition Assistance Program (SNAP). Our members want to be partners with Congress and the Administration in addressing long-standing challenges in SNAP, and are committed to strengthening program integrity and reducing waste, fraud, and abuse through investments in modern systems and effective service delivery. These state agency leaders stand ready to partner on key opportunities, rooted in everyday implementation realities, that would further enhance their technology and significantly reduce inefficiencies, waste, and long-term costs for the program to meet the current goals of the Committee. However, the proposals for significant cost shifts would fundamentally weaken the ability of states to do this work—removing the tools needed to modernize systems, safeguard integrity, and ensure programs function effectively for families. These provisions should be revisited in ways that ensure fraud and waste are addressed, while maintaining the integrity of the core benefits and fundamental structure of SNAP.

In particular, we have deep concerns about the proposed significant financial expectations imposed on states administering the SNAP through proposed cost shifts in both administrative expenses and SNAP benefits themselves. These changes would force state agencies to limit or restrict eligibility and may lead to difficult decisions about whether they can continue operating the program as it currently exists. Instead, APHSA and our members urge you to work in partnership with state and local agencies on opportunities such as utilizing the power of Artificial Intelligence that can scan through real-time data to flag where further follow up is needed, investing in modernized EBT systems to enhance card security, and more to meet our shared goals.

State agencies are fully committed to operating effective programs with integrity and being responsible stewards of taxpayer dollars. That commitment has driven investments in staffing, training, and system modernization aimed at reducing SNAP payment error rates (PERs), which have averaged over 11% in the past two years but are now beginning to decline. However, the proposed cost-share structure—which would require states to contribute between 5% and 25% of SNAP benefit costs based on their PER—would penalize states in ways that do not reflect the reality of administering a complex program and would act contrary to what is really needed. Only seven states currently have a PER below 6%, and if the current Quality Control (QC) tolerance threshold is eliminated, it is unlikely that any state would remain under that bar. The tolerance level is intended to account for small, inevitable errors in benefit calculations. With it removed, every state will see inflated error rates, misrepresenting true performance and creating undue financial hardship and negative returns on investment.



When coupled with the proposal to reduce the federal match for administrative costs from 50/50 to 25/75, states would face significant constraints to make positive changes.

Additionally, our members have shared concerns about other provisions that would increase administrative burden and cause potential harm to families, as well as the complete elimination of SNAP-Ed—an evidence-based program that promotes nutrition security and supports state-led innovation, including new initiatives like the Healthy SNAP waivers. Taken together, these proposals threaten the sustainability and accessibility of a program that plays a central role in reducing hunger and supporting family well-being across the country.

We thank you for your continued commitment to helping families meet their most basic needs. We urge the Committee to reconsider these provisions and allow for more time to partner with states to find ways to meet our collective goals of intentionally and effectively rooting out fraud and waste without threatening the core benefits that 42 million households across the country rely on every day. Our members in executive leadership positions within human services agencies welcome the opportunity to meet with you and your staff to further engage in conversation and work together. Please reach out to Lexie Kuznick, Director of Policy and Government Affairs, at <u>akuznick@aphsa.org</u> for further discussion and to schedule a meeting.

Sincerely,

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Reggie Bicha President & CEO APHSA

CC:

Chair, Rep. Glenn W. "GT" Thompson Jr. Ranking Member, Rep. Angela Dawn "Angie" Craig Vice Ranking Member, Rep. Shontel M. Brown Vice Chair, Rep. James Austin "Austin" Scott Rep. David Albert Scott Rep. Frank D. Lucas Rep. James Manuel "Jim" Costa Rep. James P. "Jim" McGovern Rep. Eric Alan "Rick" Crawford Rep. Alma Shealey Adams Rep. Scott Eugene DesJarlais, MD Rep. Douglas "Doug" LaMalfa Rep. Jahana Hayes Rep. David Cheston Rouzer Rep. BG John Trent "Trent" Kelly, ARNG Rep. Sharice Lynnette Davids



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