



BACKGROUND

In response to requests for information about actions states are pursuing to reduce Payment Error Rates (PERs) and implement H.R. 1, this document provides a high-level summary of emerging trends and common strategies underway across the country.

The Supplemental Nutrition Assistance Program (SNAP) is a large and complex program where payment accuracy reflects the interaction of policy, technology, and day-to-day operations. States are actively implementing improvements and to realize lasting results, these efforts often require system updates, worker training, and policy implementation. Since the passage of H.R. 1, states have been working intensively to implement new federal work requirements while simultaneously pursuing efforts to reduce PERs. States are not only implementing improvements, but doing so at a significant scale and pace. Meaningful shifts in data require time and deliberate investment. Some states are already seeing initial successes. For others, it's possible the condensed timelines of implementation paired with operational consequences of the federal shutdown may result in temporary increased error rates for FY26 even with investments in payment accuracy efforts. Ultimately, sustained improvements will develop over time.

To support these efforts, the American Public Human Services Association (APHSA) has convened monthly Peer Learning Community calls focused on strategies to reduce PERs and implement changes to SNAP work requirements and Medicaid community engagement expectations. With more than 400 registrants for each learning community, monthly meetings consistently garner more than 120 participants across agencies from all 50 states and two U.S. territories. The sustained participation and depth of discussion underscore a clear takeaway: **states are deeply committed to and actively pursuing an array of strategies to ensure compliance with H.R. 1 requirements, improve payment accuracy mechanisms, and preserve program operations.**

The following sections highlight the major areas in which states are concentrating their efforts and illustrate the breadth of activity underway nationwide. At a glance, these efforts include internal reviews to prepare for H.R. 1 compliance needs, improvements in technology and automation, expanded workforce training and client communications, strengthened monitoring and oversight capacity, policy reform, increased staffing and agency resources, and engagement with state legislatures to support implementation

Conducting Internal Reviews to Prepare for H.R. 1 Compliance

One of the most widespread strategies states have begun is conducting internal reviews to prepare for H.R. 1 compliance and improve payment accuracy. To explore factors influencing PERs,

State Approaches in Action: Compliance

To illustrate the implications and importance of these reviews, one state explained the launch of a comprehensive payment accuracy initiative that pairs a longitudinal data analysis of error drivers with qualitative research such as case reviews, staff shadowing, and interviews. These insights are helping the state pinpoint root causes such as untimely worker action and high value error types to shape future investments and operational improvements.

a significant number of states have begun structured root cause analyses to identify errors introduced by program systems and client-driven errors in order to provide a unified understanding of state error landscapes and enable a coordinated response. Several states have also convened state-level work groups to align Medicaid and SNAP work requirements and eligibility systems, often noting the importance of collaborating with Medicaid program staff to identify existing gaps, coordinate systems improvements, and effectively communicate changes to program staff prior to implementation. Additionally, a selection of states with county-administered models report added review of county program materials and structure to improve cross-county alignment as implementation of H.R. 1 requirements begins.

These reviews are not routine exercises. They require significant staff time, cross-agency coordination, detailed data analysis, and sustained leadership attention. In many states, this work is directly informing targeted, multi-year PER mitigation and H.R. 1 implementation strategies. It is important to emphasize that this strategic planning phase alone represents a major operational lift. It establishes the foundation for staffing changes, system upgrades, policy adjustments, and other reforms now underway.

State Approaches in Action: Technology

In practice, one state noted the impact of this approach, explaining system automation's role in eliminating duplicate shelter deductions and adding system flags that prevent workers from advancing until corrections are made. These changes, in addition to automating income verification imports from trust sources, help ensure accurate look-back periods, minimize worker input errors, and improve overall eligibility accuracy within the state.

Enhancing Technology

States are also increasingly investing in technology to assist efforts to reduce PERs and implement new work requirements. These investments typically center around automation, development of enhanced eligibility screening tools, and predictive analytics to prevent errors before they occur. For example, multiple states are building automated elements within existing eligibility and management systems to prompt staff to verify case information more prone to errors like income reporting or household composition.

Additionally, several states are already developing eligibility tools for both caseworkers and clients to navigate program eligibility and subsequent work requirements they may be subject to. These technological investments represent a forward-looking shift toward prevention and long-term accuracy.

Educational Efforts

Many states are updating training and technical assistance to prepare program staff for new H.R. 1 requirements and evolving verification standards. For example, a majority of states undergoing these efforts report revising training materials, clarifying documentation guidance, and strengthening consistency in documentation across offices and counties. An example of these efforts in practice includes one state's creation of one-page summaries and informational sheets that explain the expected impacts of H. R. 1 to SNAP and outline state efforts to ensure effective implementation across county offices. Given the scale of policy and procedural changes, workforce readiness remains a central pillar of implementation efforts nationwide.

State Approaches in Action: Education

In practice, one state implemented several of these strategies to communicate with clients and community partners through the launch of a webpage detailing changes to work requirements under H. R. 1, sharing tailored toolkits with community partners, and sending one-pagers directly to clients at risk of case closure to notify them of work requirements and explore the use of applicable exemptions.

Relatedly, states are enhancing communication strategies to reduce client-driven errors and support compliance with new requirements. While several states are planning their client communication efforts, multiple states have already launched client communication campaigns that include clearer program notices, automated case update reminders sent to clients, updated public-facing materials, and conducting targeted outreach to populations newly subject to work or community engagement requirements. These educational efforts aim to reduce preventable errors and communicate client responsibilities while maintaining transparency and program access.

Building Capacity for Monitoring and Oversight

In tandem with educational efforts for program staff, many states are pursuing greater capacity for program monitoring and oversight to improve payment accuracy. **Most state efforts in this category focus on Quality Assurance (QA) and Quality Control (QC). States are increasing QC staffing and refining case review standards and processes to better monitor error-prone elements and coordinate error mitigation efforts across all levels of program administration.** Many states have created new and expanded QA efforts by using advance data analytics that allow them to target the most error-prone cases. Additional state efforts include testing increases in QC sample sizes; enhanced training for staff on policy and interview requirements and best practices in addition to hiring more staff for QC reviews; and continued use and testing of predictive modeling to best target efforts.

State Approaches in Action: Oversight

To understand efforts to build monitoring and oversight capacity in practice, one state is conducting targeted visits to state zones with higher QC error rates to provide area-specific training and feedback loops, reporting a reduction in errors.

State Approaches in Action: Resources and Capacity

One state shared their multi-level approach to secure increased resources and capacity within a county-administered environment, noting that the state is relying on revenue from a proposition to help cover increased administrative share costs while acknowledging that current funding remains below what workload studies show is needed. Leaders within the state are working closely with counties on shared solutions, including new payment accuracy staffing, supplemental budget requests, and potential structural reforms to ensure no county bears increased costs alone and to prevent program cuts as they focus on reducing PERs.

Policy Design and Reforms

States are also strategically reassessing existing policies and developing new policy elements to ensure compliance with H.R. 1. These efforts include changes to eligibility and verification policies as part of broader PER mitigation strategies, use of policy options and approved waivers to facilitate implementation of new work requirements, and strategic alignment of SNAP and Medicaid policies. Several states specifically report modifications to self-attestation practices, strengthening documentation requirements in specific eligibility categories, and clarifying policy guidance to reduce inconsistent application.

Securing Increased Program Resources and Strengthening Capacity

States are also taking steps to strengthen staffing and operational capacity in response to H.R. 1 and ongoing PER reduction efforts. At a glance, this primarily includes pursuing

additional appropriations, increasing eligibility and quality control staffing, and preparing for cost shifts at the state and county levels. More than ten states have proposed budgets and/or secured resources to fund

increased staffing, system changes required to implement new work requirements, and efforts to reduce PERs. In several cases, states are also seeking contracted support to strengthen capacity needed to address PERs in instances where internal resources require additional development, and/or specialized expertise is needed to support targeted program improvements. These efforts reflect recognition that sustained error reduction and compliance require sufficient workforce and operational support.

Engagement with State Legislatures

Many states have also shared the importance of engaging their legislature in response to new requirements under H.R. 1 and PER mitigation. States often note the importance of legislature awareness and support to implement robust changes to SNAP. Key legislative engagement efforts focus on combinations of seeking increased budget appropriations, increased oversight and reporting requirements, communicating fiscal and operational impacts of H.R. 1, and, in some cases, proposing structural changes to program administration.

Many state agencies are pursuing legislative engagement on a number of the above issues related to H.R. 1 implementation, often preparing tailored presentations for legislative audiences to understand the potential quantifiable impacts from H.R. 1, demonstrate ongoing agency efforts, and present feasible policy interventions to ensure effective implementation.

State Approaches in Action: Engagement

In the example of one state's experience engaging with their legislature, agency staff shared their approach of quantifying county-level impacts of administrative cost shift changes and incorporating the new costs into both the state's short-session budget asks and county Fiscal Year budgets. Agency staff explained the aim of early budgeting and stakeholder engagement to help legislators and county leaders absorb the scale of the change now, with benefit/cost-shift refinements to follow later.

Summary: States are Actively Implementing and Adapting

States across the country are undertaking significant multi-faceted and wide-ranging efforts to both reduce Payment Error Rates and implement the new requirements established under H.R. 1. The activities described above reflect the scale and complexity of the work underway, spanning policy development, operational changes, workforce preparation, technology improvements, and legislative engagement. These major policy and operational shifts are also paired with an accelerated timeline to get results as quickly as possible, although we expect that meaningful and lasting shifts in payment accuracy will occur as these efforts are deployed, adapted, and sustained over time. Together, these efforts demonstrate states' strong commitment to strengthening program integrity while ensuring thoughtful and effective implementation of new federal requirements.

For more information or to discuss our work on H.R. 1 and the efforts our members are advancing, please contact Chloe Green, Assistant Director of Policy, at cgreen@aphsa.org.