American Public Human Services Association

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Chairman Brad Finstad
House Agriculture Committee
Subcommittee on Nutrition and Foreign Agriculture
2418 Rayburn HOB
Washington, DC 20515

Ranking Member Jahana Hayes
House Agriculture Committee
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Chloe Green Written Testimony on Behalf of APHSA for the Subcommittee Hearing "Exploring State Options in SNAP"

Chairman Finstad, Ranking Member Hayes, and distinguished Members of the Subcommittee: thank you for the opportunity to testify before you today. It is an honor to appear on behalf of the American Public Human Services Association (APHSA) and to contribute to this important conversation on the Supplemental Nutrition Assistance Program (SNAP) – a vital program serving more than 40 million people in our country each month.

The American Public Human Services Association

APHSA is the bipartisan, nonprofit membership association that has served as the voice of state, county, and city human services agencies for more than 90 years. We bring together leaders from across the human services sector to advance policies and practices that build thriving communities, promote economic mobility, and strengthen the well-being of families and individuals.

Our membership represents the top-level executives of state and local health and human service agencies, as well as the leaders responsible for administering core programs such as SNAP, Temporary Assistance for Needy Families (TANF), child welfare, child care, and additional supportive services. Through convening these leaders, APHSA provides a trusted forum to build common ground and develop pragmatic solutions that ensure programs work both for those who deliver them and for those who benefit from them.

My Role at APHSA

In my capacity at APHSA, I lead our work on SNAP and nutrition policy and serve as staff lead for two of our member affinity groups: the American Association of SNAP Directors (AASD) and the National Association of Program Information and Performance Measurement (NAPIPM), which focuses extensively on SNAP quality control.

I began my work with APHSA in early 2020 and had the privilege of working alongside SNAP directors as they managed the onset of the COVID-19 pandemic, supported their emergency response efforts, and guided the subsequent "unwinding" process as SNAP directors moved their programs into post-pandemic operations. From this vantage point, I witnessed firsthand how SNAP can adapt quickly to meet urgent needs of families when states are given the necessary flexibility to innovate.

<u>SNAP as a National Program</u>
SNAP currently serves nearly 42 million people each month. It is our nation's most effective evidence-based tool for reducing hunger, expanding access to nutritious food, and alleviating deep poverty. Its strength lies in its design as a national program with consistent federal standards, ensuring access to benefits for people across the country while also allowing states to make targeted programmatic choices to meet unique local needs.

Unlike "block grants" or other funding structures, SNAP's funding model is highly prescriptive. Congress establishes the framework in statute, and the U.S. Department of Agriculture (USDA) issues detailed regulations. As a result, states that operate SNAP must maintain federally-established benefit levels, eligibility rules, benefit calculations, and required program components such as SNAP Employment & Training and the SNAP Quality Control system. In other words, states do not have the ability to modify SNAP benefit amounts or make significant changes to their eligibility levels. This uniformity ensures that families are able to access the same benefits, regardless of where they live.

At the same time, there are critical areas where states have flexibilities. These options shape how individuals experience the program in their state – how they apply, recertify, and report changes in circumstances. This balance between federal uniformity and targeted state flexibility is at the heart of today's hearing.

<u>State Options in SNAP</u>
Mechanisms for State Flexibilities:
States may exercise options and pursue flexibilities through several mechanisms, listed here in order of increasing burden and requirements for state agencies:

- **Policy Options:** Available in annual state plans and already approved for use without further application or approval by USDA.
- **Major Changes:** Requiring USDA acknowledgment and additional state reporting.
- **Waivers:** Allowing temporary suspension of regulations with USDA approval.
- **Demonstration Projects:** Authorized under Section 17(b) of the Food and Nutrition Act, states may submit ideas for approval to USDA that temporarily suspend other requirements of the Act, and projects are required to include rigorous evaluation, cost neutrality, and meet strict criteria (such as prohibiting changes to eligibility).

These tools vary in administrative complexity but together provide avenues for states to tailor administration to their residents' needs. Within SNAP case processing, some steps allow for more flexibilities and options than others. The following outlines primary areas where states can elect to pursue changes.

Examples of Flexibilities throughout the SNAP Case-Processing Cycle:

- *Applications:* States may design joint applications with other human services programs to help align services and streamline customer experience. For example, they can offer online or mobile access to applications to support virtual enrollment, or simplify applications for certain populations such as for elderly or disabled individuals through the Elderly Simplified

Application Project (ESAP, currently used by 25 states), or for those who receive Supplemental Security Income (SSI) through the Combined Application Project (CAP, currently used by 17 states).[1] Many of these changes reduce administrative burdens for SNAP applicants and eligibility staff alike. Federal law, however, still requires that applications include certain core information (name, address, and signature) and that all valid applications be accepted and processed.

- *Eligibility:* Core eligibility rules – such as income and asset limits – are nationally set. Households must have income below 130% of the Federal Poverty Level (FPL), including both earned and unearned income, and assets below $3,000 for most households (or $4,500 for those with an elderly or disabled member).

  One permitted flexibility is Broad-Based Categorical Eligibility (BBCE), which is used by 44 states to adjust gross income limits to 200% FPL and/or adjust or waive asset limits in alignment with the TANF non-cash benefit program.[2] This flexibility is limited to households receiving a TANF or Maintenance of Effort-funded non-cash benefit and is only the first step in determining eligibility. All households, whether or not BBCE is applied, must have a net income below 100% FPL to qualify for SNAP benefits. In other words, under BBCE, more people may be able to have their applications reviewed for eligibility, but ultimately their actual net income must still qualify them for SNAP at the same levels of non-BBCE applicants. States often adopt BBCE because it reduces "churn" (when a household briefly loses benefits only to requalify within three months), decreases benefit cliffs, and helps families transition more successfully off SNAP as their income and savings rise.

- *Deductions & Benefit Calculations:* While maximum benefit levels and the overall formula are uniform across states, some deductions that are used to calculate total benefit amounts vary. For example, all states must set their own Standard Utility Allowances to be used as a deduction, and states may adopt a Standard Medical Deduction (SMD) as a demonstration project for households with elderly or disabled members to standardize their deduction amount – currently used by 25 states.[3] These deductions generally help reduce the administrative burden of both SNAP applicants and eligibility workers by leveraging existing statewide data and can ensure a household's utility costs are reflected in the calculation of their benefit allotment.

- *Ongoing Eligibility - Work Requirements:* Another critical aspect of ongoing eligibility is work requirements. SNAP has three layers of work requirements: the General Work Requirement (preventing voluntary job loss), the Able-Bodied Adults Without Dependents (ABAWD) time limit, and SNAP Employment & Training (E&T). While these requirements are federally established, states have limited options to adapt them. For example, states may request

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[1] SNAP State Options Report, 17th Edition.
[2] Ibid.
[3] Ibid.

waivers of the ABAWD time limit in areas with unemployment above 10 percent, and they may choose whether to structure E&T participation as mandatory for all people subject to and not meeting the work requirement, or voluntary for those who are interested in using E&T as a means to help upskill. These decisions directly affect access to SNAP for working-aged people, and these decisions also carry impacts for workload and funding needs of state agencies.

- *Certification Periods & Reporting:* Most households can be certified as eligible for SNAP for a period of up to 12 months, as prescribed by Federal law. States may choose shorter intervals such as 4 or 6 months, which is commonly recommended for households with increased risk of changes, such as those with fluctuating incomes. While longer certification periods reduce the number of recertifications (and consequently, staff workload), they may increase the risk of missing changes to circumstances. This is why states are encouraged to consider different certification lengths for different populations to balance the need for accuracy and capacity. For households with elderly or disabled members, states may allow certification periods of up to 24 months – or up to 36 months if participating in an ESAP demonstration project and the household has no earned income.

  Most states employ simplified reporting of household circumstance, meaning that they typically require reports of changes from SNAP recipients at the middle and end of their assigned certification period. Despite these timeframes, however, Federal law requires that households still report within 10 days when their gross income exceeds 130% FPL for their household size, when an ABAWD fails to meet 80 work hours per month, or when lottery or gambling winnings of $4,500 or more are received. Additional reporting may be required in some states even if it may not change their eligibility – this is also referred to as change reporting. Only one state currently employs this for all households, and it is known to create significant administrative burden for staff.

Primary Decision Factors in State Options

In general, states make decisions about whether or not to take on flexibilities based on delivering effective services to customers and managing their agency capacity and outcomes. As I shared earlier, state SNAP options show up primarily in how a customer interacts with the agency. Thus, flexibilities can often be utilized to enhance a customer's experience by making applications or report forms more user-friendly to complete, reducing the paperwork they need to submit, and enhancing how they can receive information from the agency. Many flexibilities are also used to streamline processes and reduce the time and capacity needed to complete each case. Over the last five years, we have heard constantly from state agencies about their reduced staffing levels and increased turnover – this has further heightened the need to simplify and streamline processes where applicable.

These decisions must also be balanced with the ultimate outcomes that a state agency is looking to deliver. This includes the direction from their leadership in the Governor's office and state legislature, as well as taking into consideration the funding that would need to be invested to make flexibilities successful, such as investing in new technology and staff to ensure the work is done well.

Additionally, states must weigh their own performance metrics such as their Payment Error Rates and timeliness to understand if the waivers or flexibilities could help improve or harm these. All of these decisions are nuanced and will be especially so in the coming years when states will be forced to reassess all of their flexibilities and options in light of the new funding, eligibility, and performance requirement changes enacted by the *One Big Beautiful Bill Act*.

Recommendations

Based on the experience of our members across the country, APHSA respectfully offers the following recommendations for strengthening state options within SNAP:

1. **Support Innovation.** Congress should continue to empower states to test new waivers and demonstration projects, particularly in areas such as technology, automation, user research, and artificial intelligence, which can improve efficiency and customer experience.

2. **Make Proven Flexibilities Permanent State Policy Options.** Demonstrations that have been shown to work – such as ESAP, the Standard Medical Deduction, and the Combined Application Project – should be transitioned into permanent policy options for states to elect, freeing state capacity to test additional innovations.

3. **Balance Accountability with Flexibility.** With the enactment of the *One Big Beautiful Bill Act*, states face increased pressure to reduce payment errors while operating with fewer resources. One of the top reasons that we hear from our members that they are hesitant to experiment with new flexibilities and innovations is because of potential impacts to the PER, and the current environment will potentially make them more reticent to innovate. As states shoulder greater administrative costs, Congress should consider expanding flexibilities to allow them to adapt to their unique circumstances.

4. **Engage State and Local Leaders.** Ongoing engagement with agency leaders is vital to understanding which flexibilities will be most impactful in achieving our shared goals of reducing hunger and improving program integrity.

Conclusion

SNAP is one of the most effective federal programs for reducing hunger and poverty. Its national framework ensures fairness and consistency, while carefully designed state options allow for innovation and responsiveness. By supporting state flexibility in thoughtful ways, Congress can help SNAP continue to serve households effectively and equitably across the nation.

Thank you, Chairman Finstad, Ranking Member Hayes, and Members of the Subcommittee, for your commitment to strengthening SNAP and for the opportunity to testify before you today. I look forward to your questions.