

September 25, 2026

The Honorable Glenn “GT” Thompson
Chairman, Committee on Agriculture
U.S. House of Representatives
1301 Longworth House Office Building
Washington, DC 20515

The Honorable John Boozman
Chairman, Committee on Agriculture, Nutrition, and Forestry
United States Senate
328A Russell Senate Office Building
Washington, DC 20510

cc:

The Honorable Mike Johnson, Speaker of the House of Representatives
The Honorable John Thune, Majority Leader, United States Senate

Dear Chairman Thompson and Chairman Boozman:

We write as state-based policy organizations and safety net experts with concern about the proposal to delay the SNAP benefit cost share, included in the recent Agricultural Act of 2026 advanced out of the Senate Agriculture Committee.¹ We work in the states that would receive this reprieve, and we do not believe it is what they need. What they need are tools, not another year — and as set out below, the tools cost the federal government less than half what the delay does.

We are watching state skin in the game work in real time.

Since 1965 the federal government has covered 100 percent of SNAP benefit costs while covering half of administrative costs. The incentive that structure created is exactly the one you would predict: our states economized on the caseworker hours and data checks they paid for, and had no reason to scrutinize the benefit dollars they did not.² The national payment error rate bears this out. It reached a low of 3.2 percent in FY2013 after fifteen straight years of improvement, climbed to 7.36 percent by 2019, and spiked to 11.54 percent in 2022.³ It stood at

¹ U.S. Senate Committee on Agriculture, Nutrition, and Forestry, *Agricultural Act of 2026*, 119th Cong., 2d sess., § 4101, “State Cost Share Delay” (2026).

² Leslie Ford, “What States Can Expect with the New SNAP Match: Options to Reduce State Error Rates,” Alliance for Opportunity, October 20, 2025, <https://allianceforopportunity.com/federal-snap-match-what-states-should-know/>.

³ U.S. Department of Agriculture, Food and Nutrition Service, “SNAP Payment Error Rates,” <https://www.fns.usda.gov/snap/qc/per>.

10.62 percent in FY2025 — \$10.1 billion in improper payments in a single year.⁴ Before the pandemic, erroneous payments never exceeded \$4.2 billion.⁵

Food and Nutrition Administration (FNA) already had authority to intervene. States with high error rates filed corrective action plans, and FNA could fine states above the national average two years running.⁶ Those tools were on the books the entire time the error rate tripled. They failed because none of them put a state's own budget at risk.

The One Big Beautiful Bill did, and the change in our capitals was immediate. States are finally confronting the administrative options that drove the error rate up in the first place.

Broad-based categorical eligibility is the clearest example. Federal guidance in 2009 defined a TANF “benefit” so loosely that distributing a pamphlet or publishing a 1-800 number qualifies a household for SNAP who don't meet the asset limit.⁷ Forty-five states adopted it, increasing enrollees by more than three million individuals.⁸ It is bad policy, and states are now examining whether to keep it because they will soon pay for it.

Simplified reporting compounds the damage. It allows a state to leave a household's benefit untouched—no income check, no deduction check—until recertification, requiring the household to report only income increases above the income limit. It was created by regulation in 2000 and expanded to all recipients in the 2002 Farm Bill. It was adopted by many states because it's cheaper for them to administer.^{9,10} It also guarantees higher enrollment and payments continue for months after the facts have changed.¹¹ States choose this policy option because they did not pay for it. Now they will.

Finally, states are also reversing self-attestation. SNAP rules require states to verify income, but do not impose the same across-the-board verification requirement on the deductions that reduce that income for benefit calculations. FNA guidance affirmatively tells states that best practice is

⁴U.S. Department of Agriculture, “USDA Announces FY 2025 State Payment Error Rates in SNAP,” news release, June 24, 2026, <https://www.usda.gov/about-usda/news/press-releases/2026/06/24/usda-announces-fy-2025-state-payment-error-rates-snap>.

⁵Ford, “What States Can Expect.”

⁶7 C.F.R. § 275.16, <https://www.ecfr.gov/current/title-7/subtitle-B/chapter-II/subchapter-C/part-275/subpart-E/section-275.16>; Ford, “What States Can Expect.”

⁷U.S. Department of Agriculture, Food and Nutrition Service, “Broad-Based Categorical Eligibility,” <https://www.fns.usda.gov/snap/broad-based-categorical-eligibility>.

⁸U.S. Department of Agriculture, Food and Nutrition Service, *Regulatory Reform at a Glance: Proposed Rule—Revision of SNAP Categorical Eligibility* (Washington, DC: USDA, July 2019).

⁹Food and Nutrition Act of 2008, 7 U.S.C. § 2015, <https://www.law.cornell.edu/uscode/text/7/2015>.

¹⁰U.S. Department of Agriculture, Economic Research Service, *The Effects of Simplified Reporting and Certification Length on SNAP Participation and Benefit Accuracy*, https://ers.usda.gov/sites/default/files/laserfiche/publications/43429/49497_efan04003a.pdf.

¹¹W. Clay Fannin, “Can Reducing Administrative Burdens Increase Benefit Amounts? Evidence from SNAP Simplified Reporting,” *Applied Economic Perspectives and Policy* 47, no. 3 (2025): 965–982, <https://doi.org/10.1002/aep.13508>

to resolve inconsistencies without requiring additional contact or documentation.¹² The result is that a household's word can establish its shelter costs, utility expenses, dependent care costs, medical expenses for elderly or disabled members, and in many states its composition and student status. Every one of those items reduces countable net income, and every dollar of reduction raises the monthly allotment. The errors therefore tend towards overstatement: a household that overstates its rent receives more than it is owed, while almost no one understates. The quality control data show exactly that pattern. Of the 10.62 percent national error rate in FY2025, 9.28 points were overpayments—\$8.8 billion of the \$10.1 billion total. Self-attestation also makes those errors durable. When no documentation enters the case file, there is nothing for a caseworker to check against at the next interim report and nothing for a supervisor to catch on review; the error simply persists until a quality control sample happens to pull the case.

Most encouraging, states are finally investing in the infrastructure. Mississippi's legislature funded deeper income verification tools, and the state's error rate dropped from 10.69 percent to 9.51 percent.¹³ Minnesota appropriated \$90 million to replace the 35-year-old software its counties use to process applications.¹⁴ West Virginia allotted \$13.5 million for SNAP administration and purchased payment-integrity analytics.¹⁵ Arkansas put \$5 million into its inspector general's office.¹⁶ Alongside the systems work, states are rebuilding the eligibility specialist workforce, funding real training for staff.

These are unglamorous, expensive, multi-year commitments. They are happening because there is a date on the calendar, and they are exactly what will bring error rates down and keep them down.

States have already made progress in under a year.

¹² U.S. Department of Agriculture, Food and Nutrition Service, "Supplemental Nutrition Assistance Program (SNAP)—Clarifications for Using Information from Third Party Income Databases," June 21, 2023.

¹³ "Mississippi's SNAP Error Rate Is Said to Be Down but State Still Likely on the Hook for Millions," *Magnolia Tribune*, June 1, 2026, <https://magnoliatribune.com/2026/06/01/mississippis-snap-error-rate-is-said-to-be-down-but-state-still-likely-on-the-hook-for-millions/>; "MDHS to Request Additional Funding to Address Changes, Error Rates in SNAP," *Mississippi Monitor*, December 2025, <https://www.themississippimonitor.com/mdhs-to-request-additional-funding-to-address-changes-error-rates-in-snap/>; the FY2024 and FY2025 rates cited are from U.S. Department of Agriculture, *Supplemental Nutrition Assistance Program: Payment Error Rates*, FY2024 and FY2025, <https://www.fna.usda.gov/sites/default/files/resource-files/snap-fy24QC-PER.pdf> and <https://www.fna.usda.gov/sites/default/files/resource-files/snap-qcfy25-per.pdf>.

¹⁴ "Minn. Counties Welcome State Funds to Overhaul Old Technology to Administer SNAP, Medicaid," *Albert Lea Tribune*, <https://www.albertleatribune.com/news/minn-counties-welcome-state-funds-to-overhaul-old-technology-to-administer-snap-medicaid-9a15ca4f>.

¹⁵ "WV Purchases \$876K Program to Help Lower SNAP Mistake Payments That Could Cost State Millions," *West Virginia Watch*, April 15, 2026, <https://westvirginiawatch.com/2026/04/15/wv-purchases-876k-program-to-help-lower-snap-mistake-payments-that-could-cost-state-millions/>.

¹⁶ "Advocates Worry Restrictions on SNAP Benefits Could Worsen Funding Shortfalls," *Arkansas Times*, June 30, 2026, <https://arktimes.com/arkansas-blog/2026/06/30/advocates-worry-restrictions-on-snap-benefits-could-worsen-funding-shortfalls>.

The premise of the delay is that states cannot move fast enough. New Jersey cut its payment error rate from 14.33 percent to 6.86 percent in a single year—the largest improvement in the country—by adding quality control protocols.¹⁷ Kentucky nearly cut their rate in half, dropping from 9.11 to 4.70 percent, and West Virginia fell from 9.43 to 6.69 percent, within striking distance of the threshold.¹⁸

It is also worth remembering that the FY2025 improper payment rates show that nine states are under the six percent threshold. Two states moved under the threshold, which is particularly impressive since the most recent rates also only reflect progress states were able to achieve between July 4, 2025, and September 30, 2025.

We would further note that the delay already in law is being gamed. Officials in New Mexico have acknowledged slowing their verification improvements to remain above the 13.33 percent threshold and preserve their carve-out. In Maryland, whistleblowers allege officials left correctable errors uncorrected for the same purpose.¹⁹ States that fixed their programs are being penalized relative to states that did not. Extending the delay across the board does not solve that problem, it universalizes it.

The delay is the more expensive option, and it buys the least.

CBO scores a one-year delay of the benefit cost share at roughly \$6 billion, and the two-year version at roughly \$12.5 billion.²⁰ By contrast, restoring the federal administrative match from 25 percent to 50 percent for a single year costs about \$2.7 billion. SNAP administration runs approximately \$11 billion annually; the 25-percentage-point shift beginning in FY2027 moves about \$2.7 billion of that onto states and reversing it for one year returns precisely that amount.²¹ As caseloads decline under the new work requirements, the real figure will likely come in below that.

So Congress can spend \$6 billion to move a deadline, or \$2.7 billion to help states meet it. They can even offset this cost by addressing the BBCE loophole.

¹⁷Romina Boccia and Tyler Turman, “\$10 Billion in Improper SNAP Payments Reflects the Program’s Broken Incentive Structure,” Cato at Liberty (blog), Cato Institute, July 6, 2026, <https://www.cato.org/blog/10-billion-improper-snap-payments-reflects-programs-broken-incentive-structure>.

¹⁸U.S. Department of Agriculture, Food and Nutrition Service, *Supplemental Nutrition Assistance Program: Payment Error Rates, Fiscal Year 2024*, <https://www.fna.usda.gov/sites/default/files/resource-files/snap-fy24QC-PER.pdf>; U.S. Department of Agriculture, Food and Nutrition Administration, *Supplemental Nutrition Assistance Program: Payment Error Rates, Fiscal Year 2025*, <https://www.fna.usda.gov/sites/default/files/resource-files/snap-qcfy25-per.pdf>.

¹⁹Boccia and Turman, “\$10 Billion in Improper SNAP Payments.”

²⁰Chris Clayton, “Senate Leaders Look for SNAP Offsets Ahead of Farm Bill Markup,” *DTN/Progressive Farmer*, July 16, 2026, <https://www.dtnpf.com/agriculture/web/ag/blogs/ag-policy-blog/blog-post/2026/07/16/senate-leaders-look-snap-offsets>.

²¹Angela Rachidi, “Perspective on the OBBBA’s SNAP Cuts,” American Enterprise Institute, August 7, 2025, <https://www.aei.org/articles/perspective-on-the-obbbas-snap-cuts/>.

Four reforms that meet legitimate state concerns.

Restore the federal administrative match to 50 percent for one year. Our states face the administrative cost shift in FY2027, a full year before most face any benefit liability, and that is the squeeze they describe to us most often.²² Relief timed to FY2028 arrives after the systems would already have had to be built. It is targeted, time-limited, and buys permanent capability rather than a temporary reprieve. The cost can also be offset.

Repeal or amend the SNAP “right to file.” FNA requires our states to process any application bearing a name, address, and signature, however incomplete, and to issue benefits within 30 days even when processing cannot be completed.²³ State administrators tell us they are now receiving bot-generated applications at volume.²⁴ Right to file is overwhelming eligibility workers and compounding improper payments. Congress should require that an application contain the information necessary to determine eligibility and authorize identity validation before submission.

End the merit-system personnel requirement. SNAP statute uniquely requires at least one merit-system state employee to certify applications, a constraint no comparable federal program imposes.²⁵ It prevents our states from using automated verification to authorize or deny cases and from deploying call center and contract support at scale. Removing it would let states modernize eligibility determination the way every other sector modernized years ago.

Authorize data states need to access. Congress should go further by opening federal data to state matches — PARIS, the National Directory of New Hires, SSA records, and IRS return data would each materially improve household composition and income accuracy.²⁶ This also means that the National Accuracy Clearinghouse should be fully available.

We care about this because we live in these states. Every dollar that leaves through the wrong door is a dollar that does not reach a family in our communities that needs it, and every fraudulent claim erodes public support. Three in four likely voters want the federal government

²²One Big Beautiful Bill Act, H.R. 1, 119th Cong. § 10106 (2025), <https://www.congress.gov/bill/119th-congress/house-bill/1/text>.

²³U.S. Department of Agriculture, Food and Nutrition Service, “Online Food Stamp Applications,” <https://www.fns.usda.gov/snap/admin/online-food-stamp-applications>.

²⁴ United Council on Welfare Fraud, “UCOWF Request to Modernize Right to File with Name, Address,” August 21, 2026, https://www.ucowf.net/assets/pdf/UCOWF+Right+to+File+Modernization+Request_21Aug2026/

²⁵U.S. Department of Agriculture, Food and Nutrition Service, “Non-Merit System Personnel Guidance for Call Centers (2020 Revision),” <https://www.fns.usda.gov/snap/non-merit-system-personnel-guidance-call-centers-2020-revision>.

²⁶Ford, “What States Can Expect.”

to crack down on welfare fraud.²⁷ Our states can meet this standard. Give them the tools to do it, and hold the deadline.

We would welcome the opportunity to discuss any of these proposals with your staff, and we are glad to provide state-by-state error rate and match projections at your convenience.

Sincerely,

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²⁷Les Ford and Andrew McClenahan, "Fund the Iran War by Ending Welfare Fraud," *Washington Examiner*, April 1, 2026, <https://www.washingtonexaminer.com/op-eds/4509863/fund-the-iran-war-ending-welfare-fraud/>.

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