



January 8, 2026

The Honorable Mike Johnson
Speaker
U.S. House of Representatives

The Honorable Hakeem Jeffries
Minority Leader
U.S. House of Representatives

The Honorable John Thune
Majority Leader
U.S. Senate

The Honorable Chuck Schumer
Minority Leader
U.S. Senate

Dear Speaker Johnson, Leader Jeffries, Leader Thune, and Leader Schumer:

On behalf of the National Governors Association (NGA), the American Public Human Services Association (APHSA), the National Association of Counties (NACo), the National Conference of State Legislatures (NCSL), the National Association of County Human Services Administrators (NACHSA), the National League of Cities (NLC), the International County/City Management Association (ICMA), the US Conference of Mayors (USCM), The Council of State Governments (CSG), and the state and local agencies we represent, we write to request the inclusion of targeted, time-limited Supplemental Nutrition Assistance Programs (SNAP) provisions in the anticipated January Continuing Resolution (CR).

Recent changes to SNAP under the *One Big Beautiful Bill Act* (H.R. 1/P.L. 119-21), combined with the federal government shutdown at the start of Federal Fiscal Year 2026, created significant operational disruption for states and counties at the same time new financial accountability measures tied to Payment Error Rates (PER) were taking effect. These overlapping events exposed states and counties to significant, unintended fiscal risks that undermine program stability and integrity. Ultimately, we fear that the compounding effects of these developments could put SNAP in jeopardy across the country if states and counties do not receive some form of relief.

States and counties are fully committed to administering SNAP accurately and to being held accountable for performance. H.R. 1 ties new state benefit cost-sharing requirements to PER data during a period of major policy change, delayed federal guidance, and shutdown-related disruption. Although many provisions of H.R. 1 were required to be implemented effective July 4, 2025, the U.S. Department of Agriculture (USDA) Food and Nutrition Service (FNS) issued implementation guidance incrementally through October 2025. During the same period, the federal shutdown resulted in rapidly changing and, at times, conflicting guidance on SNAP benefit issuance, leading to irregular and atypical issuance patterns nationwide. As a result, current PER data does not reflect stable or fully implemented operations.

The financial implications are significant. Under H.R. 1, states with a PER above 6 percent will be responsible for between 5 to 15 percent of SNAP benefit costs. Using FY 2024 PER data, this represents an average of \$218 million per state annually, with impacts ranging from approximately \$5.5 million in North Dakota and \$37 million in Hawaii to \$991 million in Florida and \$1.8 billion in California. Beginning in FY 2027, states will also be required to cover 75 percent of SNAP administrative costs, representing an additional average increase of \$67 million per state each year. These impacts cut across states of all sizes

and political affiliations and, if applied based on disrupted data, risk undermining ongoing investments in program integrity and ultimately the viability of the program.

To address these concerns while also preserving accountability, the above organizations respectfully request inclusion of the following provisions in the January CR:

- 1. Delay the SNAP benefit and administrative cost shares for all states until FY 2030, using FY 2027 Quality Control (QC) data.** This delay would support successful implementation of new federal policy changes, provide states and counties adequate time to reduce Payment Error Rates, and preserve investments in staffing, training, and systems essential to program integrity. While current law allows states with a PER above 13.33 percent in FY 2025 or FY 2026 to delay benefit cost sharing until FY 2030, applying this start date uniformly would avoid uneven treatment and ensure accountability is based on post-implementation data.
- 2. Exclude October and November 2025 from the FY 2026 Quality Control (QC) sample and extend hold harmless for H.R. 1-related changes through January 31, 2026.** October and November 2025 were marked by shutdown-related disruptions, delayed H.R. 1 and federal shutdown operations guidance, and irregular benefit issuance that are not statistically representative of normal operations. Excluding these months from the QC sample is permitted under existing regulation at 7 CFR 275.11(b) and (c) and would prevent distorted PER outcomes. Extending hold harmless through January 31, 2026 would allow states and counties to complete H.R. 1 implementation based on full federal guidance without being penalized for unavoidable transition errors. These actions do not excuse errors or reduce oversight; they ensure accountability reflects a period of stable operations rather than disruption.

These requests are limited in scope, temporary in nature, and designed to support accurate implementation of federal law while protecting program integrity and taxpayer dollars. They would allow states and counties to stabilize operations, continue investing in program integrity, and partner effectively with USDA to achieve shared goals.

We appreciate your consideration of these recommendations and welcome the opportunity to discuss them further. If you have any further questions, please contact Renee Antoine at rantoine@nga.org.

Sincerely,



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Reggie Bicha
President & CEO
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David Adkins
Executive Director & CEO, The Council of State
Governments (CSG)

CC:

The Honorable Glenn "G.T." Thompson, Chair, House Committee on Agriculture
The Honorable Angie Craig, Ranking Member, House Committee on Agriculture
The Honorable John Boozman, Chair, Senate Committee on Agriculture, Nutrition, and Forestry
The Honorable Amy Klobuchar, Ranking Member, Senate Committee on Agriculture, Nutrition, and Forestry