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Four priority areas for state SNAP administrators

State SNAP agencies are entering a more demanding operating environment—one defined by tighter oversight, greater accuracy expectations, expanded workload complexity, and increased financial pressure. The most effective response is not reactive compliance alone, but a forward-looking operating agenda that strengthens accuracy, reduces churn, supports frontline staff, and modernizes high-friction workflows. Recent federal policy changes, including H.R.1, are one driver of this shift, but the larger imperative is preparing agencies for what comes next.

H.R.1 introduced a wide range of policy and operational changes for SNAP, with immediate compliance and funding implications and potential opportunities to modernize eligibility, verification, and workforce workflows. State SNAP agencies have long been guided by a dual constraint: deliver benefits that are accurate and timely and be stewards of taxpayer dollars by minimizing fraud, waste, abuse, and unintentional errors. Payment error rates have fluctuated nationally for many years, and Food and Nutrition Service (FNS) oversight and requirements continually evolve, as an inherent feature of a highly monitored and regulated program.

States have continually had to balance accuracy with timeliness. Accuracy depends heavily on customers providing complete, accurate, and timely information. As requirements tighten, states will need to manage the risk of increased churn and the possibility that eligible customers may lose access, even as they pursue stronger accuracy outcomes.

To effectively manage this risk, program administrators should focus their efforts on four interconnected priority areas: increased fiscal exposure tied to payment error rates, updated able-bodied adults without dependents (ABAWD) time limits and work requirements, increased risk for churn while implementing changes, and the impending reduction in administrative funding.

Priority area 1: Build accuracy and resiliency

Payment error rates now directly shape both state fiscal exposure and customer stability, and states will need to plan and budget for the reality that their error rates can drive a state share of SNAP benefit costs. That shifts forecasting from a largely administrative exercise to a benefits financing problem: agencies will need to project a potential bill, seek state-only appropriations from their legislatures to cover the bill, and do so using limited, backward-looking inputs, such as recent payment error rate penalty tiers, the prior fiscal year's enrollment and issuance data, and a set of explicit assumptions. Building a credible estimate will be difficult because key drivers are inherently uncertain. While Disaster SNAP (D-SNAP) is funded separately and not subject to the matching obligation, each local disaster still diverts and strains the same frontline workforce administering both programs, creating operational pressure that can ripple into timeliness, accuracy, and continuity of benefits for recipients.

Efforts to reduce SNAP payment errors can be effective when they acknowledge that states are being asked to do more with less, and eligibility and enrollment casework is a tough, high-stakes job. Challenges can occur anywhere: in policy interpretation, customer reporting, workload spikes, handoffs, or human error. What matters is that state leaders can effectively improve the payment error rate (PER) by modernizing how the work is supported across people, processes, and technology, especially by leveraging advanced automation to reduce complexity.[1]

From a people standpoint, the goal is to help frontline staff make consistent decisions under pressure. Targeted training is a strong lever when it is based on what is showing up in calls, case reviews, and quality control findings, not broad refreshers. When definitions, examples, and scripts are aligned across notices, the lobby, and the call center, households receive a single message and workers spend less time translating policy. Just as important, workforce support is a performance strategy: quick-reference guides and links, refresher coaching during rollout periods, and clear escalation paths that reduce decision fatigue, help newer staff ramp up faster, and protect accuracy when retention of staff is challenging.

On the process side, improvements often come from making the next right step easier for both clientele and staff. Thoughtful, plain-language, action-oriented communications that clarify who is affected, what counts, what to report, and by when can improve the completeness and timeliness of information used to calculate benefits. Pre-deadline reminders help shift work away from last-minute urgency. Frictionless reporting, with multiple channels and simple prompts about what to submit, reduces the potential for missing details that can lead to inaccurate budgeting. Standardizing how judgment calls are handled and making documentation pathways straightforward can also improve consistency across workers and counties.

Technology is where modernization can compound these gains. Advanced automation can reduce manual keying and repetitive verification tasks, which lowers the chance of data entry mistakes and frees staff time for the decisions that truly require proficiency. Pre-populating known information, using structured prompts for document uploads, and giving households self-service status tracking all help customers provide better inputs and help workers act on them faster and more consistently. Used well, these tools do not replace staff judgment but rather can make it easier for judgment to be applied consistently, which contributes directly to PER improvement.[2]

Finally, data-driven decision-making keeps the effort focused. A simple operational rhythm that looks at leading indicators, like on-time reporting, churn signals, and call drivers tied to confusion, helps leaders spot where performance can be boosted and intervene. Over time, these targeted changes in training, workflow, and automation are what help states sustain better outcomes, even with tight budgets and workforce constraints.

Priority area 2: Build greater capacity to serve a broader able-bodied adults without dependents (ABAWD) population

As states work to reduce payment error rates, they are also implementing, or re-implementing, time-limited benefits and work requirements for ABAWDs. H.R.1 changes ABAWD policy in ways that go beyond ending or narrowing certain statewide waivers: it also expands who is captured by the ABAWD definition, meaning more customers may become subject to monthly tracking, participation rules, and potential benefit loss if requirements are not met. Operationally, this adds immediate complexity across eligibility policy, client communications, systems changes, and workforce capacity, and it increases the risk of churn or inadvertent loss of benefits for eligible households if states cannot consistently verify work activities, apply exemptions correctly, and support customers in meeting requirements.

The bill redefines who is subject to the time-limited benefits. Veterans, individuals experiencing homelessness, and adults who have aged out of foster care are no longer exempt and are now subject to the time limit. Adults with children over the age of 14 are now also subject to the time limit, as are people under age 66, up from 55. Still exempt: those with a physical or mental disability, pregnant women, and Native Americans.

While states have historically been required to determine ABAWD status and track related activities, H.R.1's new parameters mean that states need to identify the newly affected populations, screen to see whether they merit exemptions, and notify them of the new time limit and how they can retain benefits. And while most states fully implemented the new requirements in October 2025, SNAP households that experience periodic instability may re-enroll without knowledge of the changes, making clear, thoughtful, and persistent customer messaging and education a critical component of state service delivery models. As program requirements continue to evolve, state SNAP agencies should consider prioritizing additional communication capacity to prevent a rise in payment errors while serving an increasingly complex caseload with higher risk of inadvertent errors.

H.R.1 also removed the criterion of a geographic area having insufficient jobs for waiver approval; only areas with an unemployment rate of 10% may be waived, with special provisions for the states of Hawaii and Alaska. For many states, this will mean areas that have been waived, in some cases since the implementation of ABAWD rules in 1997, will now be subject to the limit.[3]

PER pressure and expanded ABAWD requirements are converging into a single operational reality: states will be asked to administer a more complex program with less tolerance for errors, and a leading response will be a coordinated set of changes that protect both accuracy and customer stability.

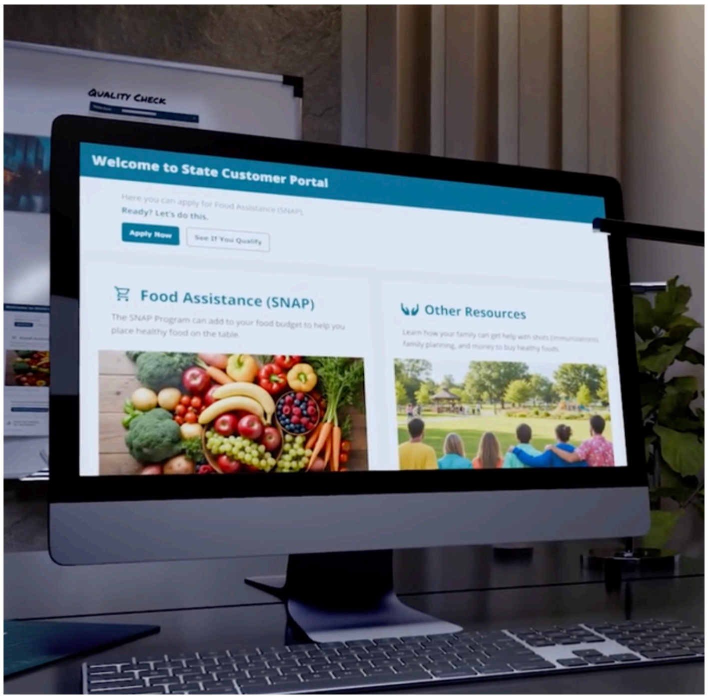
States should prioritize a modern customer communication and education strategy designed to prevent churn, not simply to satisfy notice requirements. States should leverage plain-language, action-oriented messages that explain expectations, what customers must do and by when, what proofs count, and where to get help, delivered repeatedly across channels like mail, text, email, portals, and targeted outbound calls. This approach reduces PER by improving the completeness and timeliness of customer-provided information, while also protecting stable access to food by helping customers understand exemptions, participation pathways, and the steps to keep benefits from closing during periods of housing, employment, or contact instability.

States should prioritize a modern customer communication and education strategy designed to prevent churn, not simply to satisfy notice requirements.

At the same time, states should treat ABAWD as a distinct, end-to-end workflow. That means consistently identifying newly in-scope populations, screening for exemptions early and thoroughly, documenting determinations in a way that can withstand appeals and quality control review, and applying disciplined monthly tracking that can be corrected quickly when new information emerges. When those decisions are made inconsistently or not timely, the result is predictable: avoidable closures for eligible customers, over-issuance risk, rework, and administrative burden that compounds during recertifications and reapplications.

Priority area 3: Implementing changes without increasing churn

States should also recalibrate verification and change-reporting practices so they drive down the highest-risk error drivers without inadvertently increasing procedural denials and timeliness failures.[4] A verify everything posture often backfires; instead, states can focus verification effort on the few data elements that often drive dollar errors, build in short timesaver steps before closing cases for missing information, and make effective use of collateral contacts and available data sources to reduce customer burden. This balances program integrity with empathy as customers navigate crisis, and it can reduce the likelihood that tightened requirements translate into unnecessary benefit loss.



Finally, program integrity will increasingly depend on operational infrastructure, including systems, analytics, and staffing models that anticipate shocks. States can lower manual error rates by embedding guardrails into eligibility systems, creating automated prompts for missing ABAWD fields and exemption rationale, and using dashboards that show approaching time limits, procedural closures, reopening rates, and the specific error drivers that coaching should address. A closed-loop quality approach, where PER findings translate into rapid policy clarifications, targeted coaching, and selective pre-issuance review on the highest-risk transactions, can convert PER from a retrospective compliance exercise into day-to-day management discipline. This is particularly important given that disasters and economic volatility can quickly strain the same staff administering core SNAP and disaster-related work; continuity planning, cross-training, and surge staffing playbooks become not just good management, but essential risk controls that help states remain both timely and accurate when conditions change.

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Priority area 4: Reduce administrative costs

H.R.1 reduces the federal match for SNAP administrative costs by half. Effective October 1, 2026, states' share of SNAP administrative costs will increase from 50% to 75%.

States face rising SNAP administrative costs as capacity tightens. Staffing shortages, frequent case changes, heavy call volumes, and higher mailing and facilities expenses are straining operations. Cutting costs without harming service starts with by protecting the frontline, eliminating avoidable work, and modernizing the work that remains. Administering SNAP is costly by nature—training, casework, communications, and overhead are essential to serving households that often have unstable income, housing, and access to technology. The goal isn't austerity; it's less churn, fewer touchpoints, faster clarity, and more work done right the first time.

Practically speaking, state administrators should look at where time and money are going and then select the highest-cost pressure points for action. Many states have a backlog of system enhancements and operational ideas that never rise to the top because day-to-day crises take over. However, taking advantage of the higher reimbursement rates now may yield future cost savings.

Enhancements and upgrades to electronic verification options can streamline employment and income checks, reduce manual effort, speed decisions, and improve data accuracy for staff and participants. A state agency should consider evaluating vendors and sources based on pricing, impact, and functionality, then choose a flexible approach that fits the needs identified. Collecting and managing documentation—and using it accurately—can be overwhelming. Intelligent optical character recognition (iOCR) and other AI-enabled tools can flag missing information, anomalies, and policy-relevant changes early, reducing downstream rework.

Mail is another major cost lever that can also drive churn when people miss deadlines. States should first quantify their mail-related costs by tracking mail volume as a workload metric: mailings per average caseload, what is sent, how often it is sent, and who receives it. From there, states may reduce administrative burden by expanding electronic notices (e-notices) and portal-based communication. Effective and consistent use of e-noticing varies a great deal across the nation, but a thoughtful and well-implemented digital adoption campaign could significantly increase the share of customers with consistent digital access who use e-noticing as their primary form of communication. The operational payoff of e-noticing is lower cost and faster delivery: faster delivery reduces missed deadlines, which in turn reduces churn and the costly cycle of closure and rapid reapplication.

Churn is a significant hidden cost driver states can manage. Churn can represent a large share of caseload activity and is often caused by administrative breakdowns rather than true eligibility changes.[5] That cycling creates more calls, more mail, more case actions, and more opportunities for errors. States should consider solutions that reduce preventable closures by making forms easier to understand, using SMS reminders for interviews and report due dates, choosing policy flexibilities like longer certification periods where allowed, and using processing waivers that support faster reopenings without starting from scratch. As a result of H.R. 1 financial exposure tied to errors often associated with outdated information, many states are considering shortening certification periods to reduce income and shelter-expense related errors. However, longer certification periods for some populations remain a demonstrated method of reducing administrative costs.

Policy options and waivers present themselves repeatedly as a way for leadership to reduce costs while improving timeliness. Examples include telephonic signatures so signature pages do not need to be printed, mailed, returned, and potentially missed. States often find value in reviewing currently approved waivers first, then partnering with FNS to explore additional, potentially novel waivers that could unlock efficiency, especially where the state can show the operational impact.

When considering administrative expenses, call volume is often positioned as both a symptom and a cost center. When processing is slow, communications are unclear, or reactive headlines in the news drive uncertainty, people call to check their status, clarify notices, or confirm deadlines. That can result in staff being pulled away from processing, which can slow things further. Solutions states may consider include speeding up processing where possible, communicating timelines upfront, and using interactive voice response (IVR), chatbots, and live chat to deflect routine inquiries. Live chat can be a productivity multiplier because one worker can manage multiple concurrent conversations, and even parts of interviewing can be supported through chat in some models with FNS approval. Important to note, unclear notices and website content are frequently a root cause of calls, so person-centered redesign of client-facing materials is not cosmetic; it is a cost control strategy. Embarking on a notice redesign project is a long and ambitious process, but it can result in significant customer impacts and long-term cost savings.[6]

Expanding the SNAP operational lens, states should conduct both caseload trend and staffing benchmark analyses. While economic and process disruptions are always inevitable, states should treat caseload volumes as forecastable, with monthly and annual patterns that can inform staffing and contingency planning. By benchmarking time per case action, total actions per month, and comparing that to current staffing, leaders can make more informed decisions about where overtime will spike and where processing centers or call centers can be used to level-load work across the month.

There is also the physical footprint of a state's SNAP service delivery model. Lease costs are a meaningful slice of administrative spend, and current leading practices suggest states take a balanced approach: keep in-person access available but consider a smaller footprint in high-cost areas while locating larger processing or call centers in lower-cost areas, alongside telework and shared leasing options where feasible.

States should be pragmatic about pace. Continuity of service remains a state's highest priority. Administrative cost savings progress is managed by tracking a small set of metrics over time, including application processing times (especially the time from verification received to decision), churn at 30/60/90 days, staff productivity by case action, call volume and response time, mailing and printing costs, and client satisfaction feedback. The throughline is leadership focus: modernize where it removes rework, use policy flexibilities to reduce friction, and invest before the funding shift so the state can be better positioned when financial pressure increases.

Looking ahead

H.R.1 raises the bar on accuracy, documentation, and operational discipline at the same time it reduces financial flexibility. States can meet the moment by prioritizing changes that protect customer stability while lowering avoidable rework, then sequencing modernization in manageable waves that frontline teams can absorb. The strongest path forward is practical and supportive: focus on the few decisions and workflows that drive the most errors and churn, reinforce them with clearer communications and better tools, and use a tight performance rhythm to learn quickly and adjust.

Endnotes

1 "SNAP: Keys to Payment Accuracy," Food and Nutrition Service, U.S. Department of Agriculture, March 2024.

2 Supplemental Nutrition Assistance Program -- Use of Advanced Automation in SNAP, Food and Nutrition Service, U.S. Department of Agriculture, February 24, 2025.

3 Supplemental Nutrition Assistance Program Provisions of the One Big Beautiful Bill Act of 2025 – ABAWD Waivers - Implementation Memorandum, Food and Nutrition Service, U.S. Department of Agriculture, October 3, 2025.

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5 "The Hidden Cost of Hunger: How SNAP Churn Harms Older Adults and Strains States," Food Research & Action Center, May 2026.

6 SNAP Model Notice Toolkit, Food and Nutrition Service, U.S. Department of Agriculture, August 29, 2025

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