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Master Compendium: SNAP Policy, Administration, and Performance (FY 2010-2025)

Part 1: The Shifting Landscape of SNAP: A Master Report on Policy, Outcomes, and Administration (FY 2015-2025)

Introduction: A Program of Dual Purpose

The Supplemental Nutrition Assistance Program (SNAP) is the United States' primary defense against hunger, helping over 42 million people nationwide put food on the table¹. It is a program with a dual mandate: to serve as a critical human safety net and a powerful economic stabilizer.

On a human level, SNAP is designed to reduce food insecurity and support the health and well-being of the nation's most vulnerable: children, older adults, veterans, and people with disabilities². On an economic level, it functions as a critical public-private partnership. In FY 2024, SNAP brought over \$1.73 billion into Alabama's economy alone, supporting 4,994 retailers³. Every dollar in benefits is estimated to generate up to \$1.80 in economic activity during a downturn⁴.

However, SNAP is not a monolithic federal program. It is a complex federal-state partnership, built upon a "standard" federal baseline of rules⁵. Federal law then grants states significant flexibility—known as "State Options"—to either simplify and streamline (●) these rules or to add layers of restriction and administrative burden (●)⁶. This report analyzes this dynamic framework, charting the key policy levers states control, the profound human and economic outcomes of those choices, and the system-wide "reset" caused by new federal legislation and administrative actions in 2025⁷.

Section 1: The Federal "Standard" (●) Framework and Its Inherent Frictions

To understand state choices, one must first understand the federal "standard" (●) baseline that states must implement⁸. This baseline itself contains significant complexity.

1.1 Defining the Federal Baseline: Income, Assets, and Work

To be eligible for SNAP, households must first meet federal financial criteria⁹. This "traditional eligibility" pathway requires most households to pass two separate

income tests:

- **Gross Monthly Income Test:** A household's total, non-excluded income before any deductions must be at or below 130% of the federal poverty level (FPL)¹⁰. For Fiscal Year (FY) 2026, this limit for a one-person household in the 48 contiguous states is \$1,696¹¹.
- **Net Monthly Income Test:** After applying all allowable deductions, the household's income must be at or below 100% of the FPL¹². For FY 2026, this limit for a one-person household is \$1,305¹³.

Households containing an elderly (age 60 or older) or disabled member are subject only to the net income test¹⁴. This standard baseline also includes an asset test. As of FY 2026, households may not have more than \$3,000 in countable resources, or \$4,500 if the household includes an elderly or disabled member¹⁵.

The federal baseline also includes work requirements. This encompasses general requirements and the specific, high-friction rule for "Able-Bodied Adults Without Dependents" (ABAWDs)¹⁶. Prior to 2025, the baseline ABAWD rule limited non-disabled adults aged 18-54, who were not caring for a child, to only three months of SNAP benefits in a 36-month period unless they were working or in a training program for at least 20 hours per week¹⁷.

1.2 The Federal Verification Framework

The primary driver of administrative burden is the verification of eligibility factors¹⁸. Federal regulations are explicit: states must verify identity, Social Security numbers, gross non-exempt income, and alien eligibility status¹⁹. However, for key deductions (child care, medical expenses, shelter costs), verification is discretionary unless "questionable"²⁰.

This creates an "administrative catch-22." Federal oversight bodies blame high improper payment rates on the failure to verify these requirements, pushing states toward aggressive verification²¹. Consequently, state administrators are incentivized to increase verification (🔴) to avoid federal penalties²².

1.3 The Non-Citizen Eligibility Baseline

The federal rules for non-citizens serve as a model of "standard" friction. Undocumented non-citizens are ineligible. For lawfully present non-citizens, generally, Lawful Permanent Residents (LPRs) are only eligible after a five-year waiting period²³. Exceptions exist for those with 40 qualifying work quarters, children under 18, the blind/disabled, the elderly (born before 8/22/96), military connections, and specific humanitarian statuses²⁴.

Section 2: State Policy Levers – The Spectrum of Administrative Choice

While the federal baseline sets the floor, states make dozens of choices ("State Options") that determine the actual experience of applying for SNAP²⁵.

2.1 Permissive (●) Levers to Streamline Access

- **Broad-Based Categorical Eligibility (BBCE):** Allows states to bypass the restrictive federal asset test. Rejection of BBCE is the clearest signal of a restrictive (●) posture²⁶.
- **Simplified Reporting:** Requires households to submit reports only once every 6, 12, or 24 months, reducing paperwork²⁷.
- **Elderly Simplified Application Project (ESAP):** A waiver allowing a 36-month certification period for elderly/disabled households with no interim reporting²⁸.
- **Standard Utility Allowance (SUA):** Allows a flat deduction for utilities rather than collecting individual bills²⁹.
- **Child Support Exclusion:** Treating child support payments as an income exclusion rather than a deduction³⁰.

2.2 Restrictive (●) Levers to Increase Friction

- **Punitive Disqualification Policy:** States can choose to disqualify the *entire household* rather than just the non-compliant individual³¹.
- **Food Restrictions:** States like Texas have sought waivers to restrict food choices, adopting a paternalistic posture³².

2.3 The Dual-Purpose Lever: SNAP E&T

States can design Employment & Training programs as supportive services (●) or compliance mechanisms (●) 33.

Section 3: The Great Policy Debate – Work Requirements (FY 2015-2024)

Prior to 2025, states could apply for waivers to suspend the ABAWD time limit in areas with high unemployment³⁴.

- **Statewide Waivers (●):** Shrunk from 8 states + DC/VI in 2017 to just 3 in 2023³⁵.
- **Partial Waivers (🟡):** Grew from 22 states in 2017 to 29 in 2023³⁶.
- **No Waiver (●):** Remained stable at roughly 21-23 states³⁷.

Table 1: Comparison of State ABAWD Time Limit Waiver Status (FY 2017 vs. FY 2023)

(Selected Data)

- **No Waiver:** AL, AK, AZ, AR, DE, ID, IN, KS, MS, MO, MT, NE, NH, ND, OK, SC, SD, TN, TX, UT, VT, WY.
- **Partial Waiver:** CA, CO, FL, GA, IL, MD, MA, MI, MN, NY, NC, OH, PA, VA, WA, WV, WI.
- **Full Waiver:** CT, DC, HI, NV, NJ, OR, RI, VI.³⁸

Section 4: Human and Economic Outcomes

4.1 Quantitative Snapshot

SNAP overwhelmingly serves vulnerable populations. In Alabama (representative example): 75% of households included a worker, 49% had children, 47% included a member with a disability, and 34% included an older adult 39.

4.2 & 4.3 Outcomes

- **Health:** SNAP participation reduces food insecurity and is linked to lower Medicaid cost growth⁴⁰.
- **Economic:** SNAP acts as an economic stabilizer and supports thousands of retailers⁴¹.

4.4 The Outcome of Levers

Research shows that restrictive work requirements fail to increase employment but are highly effective at reducing program participation (by up to 53% among target groups) 42.

Section 5: Policy Configurations & Longitudinal Trends

5.1 BBCE Adoption (FY 2017-2025)

- **Persistent Restrictive Bloc (No BBCE):** Alaska, Arkansas, Kansas, Missouri, South Dakota, Tennessee, Utah, Wyoming⁴³.
- **Policy Shifters:** Indiana, Louisiana, and Virginia adopted BBCE. Mississippi dropped it⁴⁴.

5.2 Case Studies

-  **Permissive:** California (Rights-based manual) and Minnesota (Public lament of restrictions)⁴⁵.
-  **Moderate:** New York (Adopts BBCE but partial waivers; mitigates harm via ESAP)⁴⁶.
-  **Restrictive:** Texas (Archetypal restrictive; seeks food restrictions) and Alabama

(Refuses waivers; burdens recipients during shutdowns) ⁴⁷.

Section 6: The Great Reset – The 2025 Shift Toward Restriction

6.1 The "One Big Beautiful Bill Act" (H.R. 1)

Signed July 4, 2025, this law imposed a new restrictive federal baseline (●)48.

- **ABAWD Age Expansion:** Increased to 18-64⁴⁹.
- **Humanitarian Exceptions Eliminated:** Repealed exceptions for veterans and homeless individuals⁵⁰.
- **Waiver Authority Gutted:** Restricted waivers to areas with >10% unemployment⁵¹.

6.2 The 2025 Administrative Crisis

A federal government shutdown in Fall 2025 led to the suspension of benefits, litigation, and "weaponized" administrative burden 52.

6.3 The Advocacy Response

Advocacy groups issued a "12 Actions" playbook to mitigate harm. The new categorization is based on reaction to the mandate:

- **Mitigating (New ●):** Implementing options like ESAP to buffer harm (e.g., NY).
- **Implementing (New ○):** Passive implementation (e.g., AL).
- **Amplifying (New ○):** Adding state-level restrictions (e.g., TX) ⁵³.

Section 7: The Territorial Exception

- **SNAP Territories:** Guam and USVI operate under SNAP rules and are categorized with states⁵⁴.
- **NAP Territories:** Puerto Rico, American Samoa, and CNMI operate under capped block grants (NAP), which are inherently restrictive (●) ⁵⁵.

Section 8: Final Categorization

Table 4: SNAP State Administrative Posture Categorization (FY 2024, Pre-OBBBA)
(Selected Examples)

- **Alabama:** Yes BBCE, No Waiver, Simplified Reporting, Individual Disqualification.
- **Texas:** Yes BBCE, No Waiver, Simplified Reporting, **Household** Disqualification.
- **New York:** Yes BBCE, Partial Waiver, Simplified & Change Reporting, Individual Disqualification.

Conclusion: The OBBBA has rendered the 2015-2024 categorization obsolete. The federal baseline is now . States are now defined by whether they mitigate, implement, or amplify this high-friction system⁵⁷.

Part 2: SNAP State Policy Categorization Research (Longitudinal Analysis)

Note: This section contains significant longitudinal data analysis and specific state policy levers complementing Part 1.

Part 1: The Federal "Standard" () Framework Evolution

The federal baseline establishes the eligibility rules regarding Income (Gross/Net tests), Assets (\$3,000/\$4,500 limits in FY 2026), and Work Requirements⁵⁸. A critical tension exists in verification: FNS mandates verification of some factors but leaves others (shelter, medical) as discretionary unless "questionable." This creates an "administrative catch-22" where states risk federal penalties for errors if they do not verify, pushing them toward restrictive practices⁵⁹.

Part 2: Defining Categorization

- **Primary Permissive Lever ()**: Broad-Based Categorical Eligibility (BBCE). Adoption allows states to bypass the federal asset test⁶⁰.
- **Restrictive Levers ()**: Refusal of ABAWD waivers and punitive "entire household" disqualification policies⁶¹.

Part 3: Longitudinal Analysis (FY 2015-2024)

- **BBCE Adoption**: A persistent "Restrictive" bloc (AK, AR, KS, MO, SD, TN, UT, WY) has rejected BBCE for a decade. Indiana, Louisiana, and Virginia shifted to adopt it; Mississippi dropped it⁶².
- **Waiver Erosion**: Even before 2025, statewide ABAWD waivers dropped from 8+ territories in 2017 to just 3 in 2023⁶³.

State Profiles:

- **California ()**: Rights-based manual, partial waivers, individual disqualification.
- **Minnesota ()**: Publicly framed recipients as "neighbors" during 2025 restrictions.

- **Texas (🔴):** Adopted BBCE but refuses waivers, uses household disqualification, and actively seeks food restrictions.
- **Alabama (🔴🟡):** Uses BBCE but refuses waivers; placed burden on recipients during the 2025 shutdown⁶⁴.

Part 4: The Great Reset (2025)

The "One Big Beautiful Bill Act" (H.R. 1) reset the federal baseline to Restrictive (🔴) by mandating work requirements for adults up to age 64 and gutting waiver authority⁶⁵. The subsequent government shutdown and litigation "weaponized" administrative burden, paralyzing state agencies between court orders and USDA penalties⁶⁶.

Part 3: SNAP Data Analysis and Crisis Impact (November 2025 Shutdown Context)

I. Executive Briefing: The November 2025 SNAP Disruption

As of November 16, 2025, Pennsylvania is navigating a severe benefits crisis due to a federal government shutdown. This halted November benefits for nearly two million recipients⁶⁷. While the government reopened on November 12, the crisis revealed systemic fragility⁶⁸.

II. Analysis of SNAP Payment Error Rates (PER)

The PER measures accuracy (Overpayments + Underpayments).

- **National Trends:** The PER rose from 7.36% in FY 2019 to 11.54% in FY 2022 and 11.68% in FY 2023⁶⁹.
- **State Ramifications:** In FY 2019, 17 states met the <6% accuracy standard. By FY 2022, only 7 states did⁷⁰.

III. Verification of PER Components

Double Check Verification: The sum of Overpayment and Underpayment rates matches the reported Total PER (allowing for rounding).

- **Key Finding:** Overpayments are the dominant component (e.g., in FY 2023, National OP was 10.03% vs UP 1.64%)⁷¹.

Selected Data from Verification Table (FY 2023):

- **Alabama:** 6.55% OP + 0.52% UP = 7.07% Total.
- **California:** 11.83% OP + 1.57% UP = 13.40% Total.
- **Maryland:** 15.07% OP + 3.91% UP = 18.98% Total.
- **Pennsylvania:** 12.92% OP + 1.90% UP = 14.82% Total.
- **Texas:** 7.50% OP + 2.22% UP = 9.72% Total.⁷²

IV. Case and Procedural Error Rates (CAPER)

CAPER measures errors in denials and terminations. The national average has nearly doubled from 23.27% in FY 2015 to 44.52% in FY 2023⁷³. A 2016 policy change tied corrective action to the "national average," creating a "moving goalpost" that weakens accountability⁷⁴.

V. Application Processing Timeliness (APT)

States face an "Administrative Squeeze": they must keep PER <6% (Accuracy) and APT >90% (Speed). These goals are often in tension.

- **Chronic Delays:** In FY 2023, DC had an APT of 48.13%. Florida dropped to 64.38%⁷⁵⁷⁵⁷⁵⁷⁵.

VI. Integrated Analysis: Pennsylvania Performance

Pennsylvania Dashboard (FY 2023):

- **PER:** 14.82% (High/Failing).
- **CAPER:** 29.42% (Good - better than US avg of 44.52%).
- **APT:** 92.06% (Acceptable - above 90% threshold).

Conclusion: PA is optimized for **SPEED** over **ACCURACY**. This "fast but error-prone" profile made it uniquely vulnerable to the shutdown shock⁷⁶.

VII. Strategic Recommendations

1. **Reframe the Narrative:** Frame the crisis as a federal failure and demand 100% administrative reimbursement⁷⁷.
2. **Address the PER:** PA must develop a CAP for its high error rate, arguing that the system is "running too fast"⁷⁸.
3. **Resolve the Squeeze:** Advocate for federal reform that rewards balancing speed

and accuracy⁷⁹.

Part 4: SNAP Policy and Performance Analysis (Maryland & Pennsylvania)

I. Executive Summary

Maryland: Confronting a systemic failure in benefits access. Its FY 2024 PER of 13.64% is driven by an exceptionally high Underpayment Rate of 4.79% (nearly triple the national average). This indicates eligible households are not receiving entitled benefits⁸⁰.

Pennsylvania: High PER (10.76% in FY 2024) but driven by Overpayments. Its underpayment rate (1.27%) is better than the national average⁸¹.

Strategic Risk: MD is implementing strict verification (AT #26-03) to fix overpayments, which conflicts with its mandate to improve processing timeliness (APT)⁸².

II. Historical Baseline

- **Pre-Suspension (2010-2014):** Low error rates, but data quality issues led to a suspension of reporting in FY 2015-2016⁸³.
- **Post-Pandemic Shock:** After the COVID-19 hiatus (FY 2020-2021), Maryland's PER exploded to 35.56% in FY 2022⁸⁴.

III. Deep Dive: Maryland

Maryland's error profile is defined by **Underpayments**.

- **FY 2024 Data:** 8.85% Overpayment (better than US avg) vs 4.79% Underpayment (worse than US avg) ⁸⁵.
- **Timeliness:** APT was failing at 88.14% in Jan 2024⁸⁶.
- **Corrective Action Paradox:** The state is under an FNS mandate to speed up processing (APT CAP) but has issued a state mandate (AT #26-03) to increase verification burdens. This is an operational contradiction⁸⁷.

IV. Comparative Analysis: Pennsylvania

PA prioritizes access through waivers:

- **Unscheduled Interviews (On-Demand):** Implemented 7/1/2024.

- **Telephonic Signature:** Implemented 4/1/2023.
- Change of Address Procedures: Simplified 7/1/2024.
Maryland has adopted fewer of these high-impact waivers⁸⁸.

V. Strategic Recommendations for Maryland

1. **Prioritize APT CAP:** Fix the core timeliness function first⁸⁹.
2. **Monitor AT #26-03:** Watch for unintended degradation of access due to new verification rules⁹⁰.
3. **Pursue Waivers:** Adopt On-Demand interviews and Telephonic Signatures to create capacity⁹¹.
4. **Root Cause Analysis:** Diagnose *why* underpayments are occurring (e.g., failure to process shelter costs)⁹².

Part 5: State SNAP Policy Access vs. Verification (Methodology)

I. A New Framework

This report presents a methodology to classify state policies on an "Access vs. Verification" spectrum.

- **Ease of Access:** Policies that reduce burden (e.g., BBCE, mobile apps).
- **Ease of Verification:** Policies that enforce integrity (e.g., Asset Verification Systems, mandatory interviews) ⁹³.

II. The State Policy Ledger

A verifiable tracking system using "observable artifacts" (State Options Reports, laws, manuals).

- *Example:* **California (Access):** Repeal of drug felon ban (ACL 14-92).
- *Example:* **Texas (Verification):** Mandatory Asset Verification System (Bulletin 24-08).
- *Example:* **Maryland (Verification):** Mandatory Clearance Systems (AT 26-03) ⁹⁴.

III. The Access & HCD Score

Measures burden.

- **+Access Variables:** BBCE, No Asset Test, 12+ Month Recertification, Interview Waivers.
- **-Access Variables:** Frequent recertification, Mandatory interviews, Account requirements for online apps⁹⁵.

IV. The Verification & Integrity Score

Measures administrative rigor.

- **+Verification Variables:** Active Asset Tests, Mandatory Electronic Verification (AVS), Data Brokering.
- **-Verification Variables:** BBCE, Interview Waivers⁹⁶.

VI. The OBBBA Inflection Point

The OBBBA (H.R. 1) creates direct state fiscal liability for benefit costs based on PER.

- **Penalty Tiers:** PER >10% results in a 15% state match liability⁹⁷.
- **Projected Liability (FY 2024 Data):** PA (10.76%), CA (10.98%), and MD (13.64%) face "Severe Liability" (15% match)⁹⁸.
- **The Pivot:** States will likely dismantle BBCE and mandate verification to lower PER and avoid these costs⁹⁹.

Part 6: State SNAP Policy Historical Access (Archives Report)

I. Executive Summary

Analysis of policy archives in California, Texas, Wyoming, and Maryland confirms high public access to historical documentation.

- **California:** Chronological List Archives.
- **Texas:** Iterative Handbook Archives.
- **Wyoming:** Granular Changelog Archives.
- **Maryland:** Multi-Layered Legal Archives¹⁰⁰.

II. Four-State Assessment

A. California (1974-2025)

- **Structure:** All-County Letters (ACLs) available year-by-year.

- **Key Trends:** Expansionist trajectory. Repealed drug felon ban (2015) and expanded to SSI recipients (2019)¹⁰¹.

B. Texas (2017-2025)

- **Structure:** "Texas Works Handbook" (living document) updated via Quarterly Revisions and Policy Bulletins. Requires reconstruction for history.
- **Key Trends:** Modernization of vehicle asset test (2023) coupled with mandatory Asset Verification System rollout (2024-2025)¹⁰².

C. Wyoming (2016-2025)

- **Structure:** "CM Updates" log providing granular edit tracking.
- **Key Trends:** Direct implementation of federal mandates (FRA, H.R. 1) regarding ABAWDs¹⁰³.

D. Maryland (1998-2026)

- **Structure:** COMAR (Law) -> SNAP Manual -> Action Transmittals (AT).
- **Key Trends:**
 - **2025 Hardening:** AT 26-03 mandated electronic verification systems, moving away from document-based verification¹⁰⁴.
 - **Crisis:** AT 26-10 documented the suspension of November 2025 benefits during the shutdown¹⁰⁵.

III. Comparative Analysis

States are in a period of flux (2023-2026) driven by federal mandates (restrictions) and tech modernization (verification). However, divergent trajectories exist: while MD and TX harden verification, CA and OH (raising income limits to 200% FPL) continue to expand access¹⁰⁶.

Other States with High Access:

New York (SNAP Source Book), Pennsylvania (Archived Handbooks), Florida (Previous Policy Memos), Illinois, Ohio, Massachusetts, Oregon, Washington¹⁰⁷.