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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 table<sup>1</sup>. 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 disabilities<sup>2</sup>. 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 retailers<sup>3</sup>. Every dollar in benefits is estimated to generate up to \$1.80 in economic activity during a downturn<sup>4</sup>.

However, SNAP is not a monolithic federal program. It is a complex federal-state partnership, built upon a "standard" federal baseline of rules<sup>5</sup>. 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 (●)<sup>6</sup>. 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 2025<sup>7</sup>.

#### **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 implement<sup>8</sup>. 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 criteria<sup>9</sup>. 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)<sup>10</sup>. For Fiscal Year (FY) 2026, this limit for a one-person household in the 48 contiguous states is \$1,696<sup>11</sup>.
- **Net Monthly Income Test:** After applying all allowable deductions, the household's income must be at or below 100% of the FPL<sup>12</sup>. For FY 2026, this limit for a one-person household is \$1,305<sup>13</sup>.

Households containing an elderly (age 60 or older) or disabled member are subject only to the net income test<sup>14</sup>. 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 member<sup>15</sup>.

The federal baseline also includes work requirements. This encompasses general requirements and the specific, high-friction rule for "Able-Bodied Adults Without Dependents" (ABAWDs)<sup>16</sup>. 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 week<sup>17</sup>.

### 1.2 The Federal Verification Framework

The primary driver of administrative burden is the verification of eligibility factors<sup>18</sup>. Federal regulations are explicit: states must verify identity, Social Security numbers, gross non-exempt income, and alien eligibility status<sup>19</sup>. However, for key deductions (child care, medical expenses, shelter costs), verification is discretionary unless "questionable"<sup>20</sup>.

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 verification<sup>21</sup>. Consequently, state administrators are incentivized to increase verification (●) to avoid federal penalties<sup>22</sup>.

### 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 period<sup>23</sup>. 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 statuses<sup>24</sup>.

## 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 SNAP<sup>25</sup>.

## 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 (●) posture<sup>26</sup>.
- **Simplified Reporting:** Requires households to submit reports only once every 6, 12, or 24 months, reducing paperwork<sup>27</sup>.
- **Elderly Simplified Application Project (ESAP):** A waiver allowing a 36-month certification period for elderly/disabled households with no interim reporting<sup>28</sup>.
- **Standard Utility Allowance (SUA):** Allows a flat deduction for utilities rather than collecting individual bills<sup>29</sup>.
- **Child Support Exclusion:** Treating child support payments as an income exclusion rather than a deduction<sup>30</sup>.

## 2.2 Restrictive (●) Levers to Increase Friction

- **Punitive Disqualification Policy:** States can choose to disqualify the *entire household* rather than just the non-compliant individual<sup>31</sup>.
- **Food Restrictions:** States like Texas have sought waivers to restrict food choices, adopting a paternalistic posture<sup>32</sup>.

## 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 unemployment<sup>34</sup>.

- **Statewide Waivers (●):** Shrank from 8 states + DC/VI in 2017 to just 3 in 2023<sup>35</sup>.
- **Partial Waivers (●):** Grew from 22 states in 2017 to 29 in 2023<sup>36</sup>.
- **No Waiver (●):** Remained stable at roughly 21-23 states<sup>37</sup>.

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. <sup>38</sup>

## 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 <sup>39</sup>.

### 4.2 & 4.3 Outcomes

- **Health:** SNAP participation reduces food insecurity and is linked to lower Medicaid cost growth <sup>40</sup>.
- **Economic:** SNAP acts as an economic stabilizer and supports thousands of retailers <sup>41</sup>.

### 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) <sup>42</sup>.

## 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, Wyoming <sup>43</sup>.
- **Policy Shifters:** Indiana, Louisiana, and Virginia adopted BBCE. Mississippi dropped it <sup>44</sup>.

### 5.2 Case Studies

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

(Refuses waivers; burdens recipients during shutdowns) <sup>47</sup>.

## 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 (●) <sup>48</sup>.

- **ABAWD Age Expansion:** Increased to 18-64 <sup>49</sup>.
- **Humanitarian Exceptions Eliminated:** Repealed exceptions for veterans and homeless individuals <sup>50</sup>.
- **Waiver Authority Gutted:** Restricted waivers to areas with >10% unemployment <sup>51</sup>.

### 6.2 The 2025 Administrative Crisis

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

### 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) <sup>53</sup>.


## Section 7: The Territorial Exception

- **SNAP Territories:** Guam and USVI operate under SNAP rules and are categorized with states <sup>54</sup>.
- **NAP Territories:** Puerto Rico, American Samoa, and CNMI operate under capped block grants (NAP), which are inherently restrictive (●) <sup>55</sup>.

## 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 system <sup>57</sup>.

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## 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 Requirements <sup>58</sup>. 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 practices<sup>59</sup>.



### Part 2: Defining Categorization

- **Primary Permissive Lever** (): Broad-Based Categorical Eligibility (BBCE). Adoption allows states to bypass the federal asset test<sup>60</sup>.
- **Restrictive Levers** (): Refusal of ABAWD waivers and punitive "entire household" disqualification policies <sup>61</sup>.

### 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 it <sup>62</sup>.
- **Waiver Erosion:** Even before 2025, statewide ABAWD waivers dropped from 8+ territories in 2017 to just 3 in 2023<sup>63</sup>.

### 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 shutdown <sup>64</sup>.

## 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 authority <sup>65</sup>. The subsequent government shutdown and litigation "weaponized" administrative burden, paralyzing state agencies between court orders and USDA penalties<sup>66</sup>.

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## 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 recipients<sup>67</sup>. While the government reopened on November 12, the crisis revealed systemic fragility<sup>68</sup>.

### 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 2023 <sup>69</sup>.
- **State Ramifications:** In FY 2019, 17 states met the <6% accuracy standard. By FY 2022, only 7 states did<sup>70</sup>.

### 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%)<sup>71</sup>.

#### **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.<sup>72</sup>

#### **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 2023<sup>73</sup>. A 2016 policy change tied corrective action to the "national average," creating a "moving goalpost" that weakens accountability<sup>74</sup>.

#### **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%<sup>75757575</sup>.

#### **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 shock<sup>76</sup>.

#### **VII. Strategic Recommendations**

1. **Reframe the Narrative:** Frame the crisis as a federal failure and demand 100% administrative reimbursement<sup>77</sup>.
2. **Address the PER:** PA must develop a CAP for its high error rate, arguing that the system is "running too fast"<sup>78</sup>.
3. **Resolve the Squeeze:** Advocate for federal reform that rewards balancing speed

and accuracy<sup>79</sup>.

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## 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 benefits<sup>80</sup>.

Pennsylvania: High PER (10.76% in FY 2024) but driven by Overpayments. Its underpayment rate (1.27%) is better than the national average<sup>81</sup>.

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

### II. Historical Baseline

- **Pre-Suspension (2010-2014):** Low error rates, but data quality issues led to a suspension of reporting in FY 2015-2016<sup>83</sup>.
- **Post-Pandemic Shock:** After the COVID-19 hiatus (FY 2020-2021), Maryland's PER exploded to 35.56% in FY 2022<sup>84</sup>.

### 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) <sup>85</sup>.
- **Timeliness:** APT was failing at 88.14% in Jan 2024<sup>86</sup>.
- **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 contradiction<sup>87</sup>.

### 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 waivers<sup>88</sup>.

## V. Strategic Recommendations for Maryland

1. **Prioritize APT CAP:** Fix the core timeliness function first<sup>89</sup>.
2. **Monitor AT #26-03:** Watch for unintended degradation of access due to new verification rules<sup>90</sup>.
3. **Pursue Waivers:** Adopt On-Demand interviews and Telephonic Signatures to create capacity<sup>91</sup>.
4. **Root Cause Analysis:** Diagnose *why* underpayments are occurring (e.g., failure to process shelter costs)<sup>92</sup>.

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## 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)<sup>93</sup>.

### 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)<sup>94</sup>.

### 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 apps <sup>95</sup>.

#### IV. The Verification & Integrity Score

Measures administrative rigor.

- **+Verification Variables:** Active Asset Tests, Mandatory Electronic Verification (AVS), Data Brokering.
- **-Verification Variables:** BBCE, Interview Waivers <sup>96</sup>.

#### 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 liability<sup>97</sup>.
- **Projected Liability (FY 2024 Data):** PA (10.76%), CA (10.98%), and MD (13.64%) face "Severe Liability" (15% match)<sup>98</sup>.
- **The Pivot:** States will likely dismantle BBCE and mandate verification to lower PER and avoid these costs<sup>99</sup>.

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### 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 Archives <sup>100</sup>.

#### 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) <sup>101</sup>.

#### **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) <sup>102</sup>.

#### **C. Wyoming (2016-2025)**

- **Structure:** "CM Updates" log providing granular edit tracking.
- **Key Trends:** Direct implementation of federal mandates (FRA, H.R. 1) regarding ABAWDs <sup>103</sup>.

#### **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 verification <sup>104</sup>.
  - **Crisis:** AT 26-10 documented the suspension of November 2025 benefits during the shutdown <sup>105</sup>.

### **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 access <sup>106</sup>.

Other States with High Access:

New York (SNAP Source Book), Pennsylvania (Archived Handbooks), Florida (Previous Policy Memos), Illinois, Ohio, Massachusetts, Oregon, Washington <sup>107</sup>.