

Analysis of SNAP Administrative Performance Metrics in the Context of the November 2025 Shutdown

I. Executive Briefing: The November 2025 SNAP Disruption and Systemic Performance Context

This report provides a comprehensive, longitudinal analysis of key performance metrics for the Supplemental Nutrition Assistance Program (SNAP), as requested. The data covers Payment Error Rates (PER), Case and Procedural Error Rates (CAPER), and Application Processing Timeliness (APT) for recent fiscal years.

The analysis is framed by the acute, time-sensitive crisis occurring as of the date of this briefing (November 16, 2025). The Commonwealth of Pennsylvania, and specifically the city of Philadelphia, is navigating an unprecedented disruption in SNAP benefit delivery. This disruption provides a critical, real-world context for understanding the systemic vulnerabilities revealed in the requested performance data.

A. The Acute Crisis (November 16, 2025)

As of this date, Pennsylvania is in the midst of a severe benefits crisis. A federal government shutdown, which began when funding lapsed on November 1, 2025, resulted in the U.S. Department of Agriculture (USDA) halting the issuance of November SNAP benefits. This action immediately jeopardized food security for the nearly two million SNAP recipients in Pennsylvania.

The impact on the Commonwealth's vulnerable populations is extensive, affecting over 713,000 children and 697,000 older adults statewide. In Philadelphia, the situation is particularly dire, with nearly 472,000 residents—approximately 30% of the city's population—enrolled in the program.

The crisis has been exacerbated by significant legal and political volatility. In response to the funding halt, the Shapiro Administration, along with 24 other states, filed a lawsuit against the Trump Administration. A subsequent federal court order on November 6 required the USDA to release the benefits. However, as the Pennsylvania Department of Human Services (DHS) began processing payments, the Trump Administration appealed to the U.S. Supreme Court, which issued a temporary stay, pausing the payments once again. This back-and-forth left millions of recipients in a state of confusion and distress, unsure if or when their benefits would arrive.

The government officially reopened on Wednesday, November 12, with the reopening measure signed on November 13. As of November 14, the Pennsylvania DHS has been actively working to issue all delayed November benefits, with officials stating that all payments should be fully loaded onto recipients' EBT cards "by the weekend".

B. Report Objective: Connecting Crisis to Context

This report fulfills the directive to compile and analyze longitudinal data for PER, CAPER, and APT. The proximate cause of the November 2025 crisis is undeniably the federal government shutdown. However, this report will demonstrate that the shutdown's impact was so immediate and catastrophic because it struck a national SNAP administrative system that was already historically fragile.

The data presented herein will show that in the years preceding this event, the national program was operating with unprecedented levels of payment errors, high procedural error rates, and significant, persistent processing delays in many states.

The three metrics requested—PER, CAPER, and APT—are the primary indicators used by the USDA's Food and Nutrition Service (FNS) to measure the *systemic administrative health* of state-run SNAP programs. By analyzing these metrics, this report provides the essential, data-driven context to diagnose *why* the system broke so completely and so quickly. This analysis moves beyond the simple "shutdown" explanation to identify the underlying, pre-existing administrative vulnerabilities that amplified the crisis.

II. Analysis of SNAP Payment Error Rates (PER): A Longitudinal Review (FY 2019-2024)

This section presents the national and state-level data for Payment Error Rates (PER), which establishes the first pillar of the systemic fragility analysis.

A. Defining the Payment Error Rate (PER)

The Payment Error Rate (PER) is the primary metric used by FNS to measure the accuracy of state-level eligibility and benefit determinations for *active, participating* SNAP households. The PER is a composite metric, representing the sum of two distinct error types:

1. **Overpayment (OP) Errors:** Benefits issued to ineligible households or eligible households who received more benefits than they were entitled to.
2. **Underpayment (UP) Errors:** Benefits issued to eligible households who received fewer benefits than they were entitled to.

The PER is a critical component of federal oversight. Per FNS regulations, any state with a validated PER exceeding 6% is required to develop and implement a Corrective Action Plan (CAP) to identify and fix the root causes of the errors. States with persistently high error rates may be subject to financial penalties.

B. National PER Trends: A System Under Strain

A significant disruption in the data series occurred due to the COVID-19 public health emergency. FNS suspended certain Quality Control (QC) requirements, and as a result, the agency did not establish official national or state-level PERs for Fiscal Year (FY) 2020 or FY 2021.

An analysis of the available data from FY 2019 to FY 2024 reveals a significant degradation in payment accuracy nationwide following this data gap.

- **FY 2019 (Pre-Pandemic):** The national PER was **7.36%**.
- **FY 2022 (Post-Pandemic):** The national PER increased sharply to **11.54%**.

- **FY 2023:** The national PER rose again to **11.68%**. The U.S. Government Accountability Office (GAO) contextualized this rate as 11.7%, representing approximately **\$10.5 billion** in improper payments.
- **FY 2024:** The national PER saw a minor decline but remained exceptionally high at **10.93%**.

C. State-Level Ramifications and Analysis

The sharp increase in the national error rate from 7.36% in FY 2019 to 11.54% in FY 2022—a 57% increase—had profound consequences for state agencies. A critical statistic from the FNS FY 2022 annual report highlights the scale of this systemic degradation: "For FY 2022, seven states have a validated payment error rate below 6 percent, a decrease from the 17 states reported in FY 2019.".

This single data point is revealing. In FY 2019, 17 states were operating at or above the federal standard for accuracy (i.e., below the 6% CAP threshold). By FY 2022, only seven states were. This means the number of states *failing* the 6% accuracy standard and being forced into the administratively burdensome Corrective Action Plan process more than doubled.

This is not an issue of a few failing states; it is evidence of a systemic, nationwide degradation in payment accuracy. The administrative burdens of the pandemic, including the management of Emergency Allotments and the operational challenges of "limited staffing", created a "technical debt" in accuracy. This left the entire administrative system in a weaker, more error-prone state heading into 2024 and 2025.

III. Verification of Payment Error Rate Components: Overpayment and Underpayment Reconciliation

This section fulfills the user's explicit directive to "double check" the Payment Error Rate data by verifying that the Overpayment and Underpayment components mathematically reconcile with the reported total PER.

A. Mandate and FNS Disclaimer

The analysis required verifying that for each state and fiscal year, the sum of the reported Overpayment Rate and the Underpayment Rate equals the reported Total Payment Error Rate. This verification confirms that the data is internally consistent and reliable. All primary FNS source documents reporting these rates include an identical, critical disclaimer: "**Due to rounding, the payment error rate may not always equal the sum of the over payment and under payment error rate.**"

The verification below confirms that this rounding disclaimer is the sole source of any minor (typically \$0.01) discrepancies. The data is sound.

B. Core Data Verification Table

The following table provides the comprehensive state-by-state verification for all years where complete component data was available (FY 2019, FY 2022, FY 2023, and FY 2024).

Key Table 1: Verification of SNAP Payment Error Rate (PER) Components by State (FY 2019, 2022, 2023, 2024)

| State/Territory | Fiscal Year | Overpayment Rate (%) | Underpayment Rate (%) | Calculated Sum (OP+UP) | Reported Total PER | Verification Status |
|-------------------|-------------|----------------------|-----------------------|------------------------|--------------------|---------------------|
| U.S. Total | 2024 | 9.26 | 1.67 | 10.93 | 10.93 | Match |
| U.S. Total | 2023 | 10.03 | 1.64 | 11.67 | 11.68 | Rounding |
| U.S. Total | 2022 | 9.84 | 1.70 | 11.54 | 11.54 | Match |
| U.S. Total | 2019 | 6.18 | 1.18 | 7.36 | 7.36 | Match |
| Alabama | 2023 | 6.55 | 0.52 | 7.07 | 7.07 | Match |
| Alabama | 2022 | 3.96 | 0.72 | 4.68 | 4.68 | Match |
| Alabama | 2019 | 6.87 | 0.42 | 7.29 | 7.29 | Match |
| Alaska | 2023 | 59.90 | 0.47 | 60.37 | 60.37 | Match |
| Alaska | 2022 | 56.69 | 0.29 | 56.98 | 56.97 | Rounding |
| Alaska | 2019 | 9.07 | 2.12 | 11.19 | 11.19 | Match |
| Arizona | 2023 | 9.77 | 1.62 | 11.39 | 11.39 | Match |
| Arizona | 2022 | 9.62 | 1.77 | 11.39 | 11.39 | Match |
| Arizona | 2019 | 4.41 | 0.84 | 5.25 | 5.24 | Rounding |
| Arkansas | 2023 | 8.84 | 0.73 | 9.57 | 9.57 | Match |
| Arkansas | 2022 | 10.21 | 1.10 | 11.31 | 11.31 | Match |
| Arkansas | 2019 | 5.48 | 0.43 | 5.91 | 5.91 | Match |
| California | 2023 | 11.83 | 1.57 | 13.40 | 13.40 | Match |
| California | 2022 | 9.59 | 1.51 | 11.10 | 11.10 | Match |
| California | 2019 | 6.42 | 0.89 | 7.31 | 7.31 | Match |
| Colorado | 2023 | 6.94 | 1.67 | 8.61 | 8.61 | Match |
| Colorado | 2022 | 5.29 | 2.02 | 7.31 | 7.31 | Match |
| Colorado | 2019 | 6.91 | 1.76 | 8.67 | 8.67 | Match |
| Connecticut | 2023 | 7.42 | 1.49 | 8.91 | 8.91 | Match |
| Connecticut | 2022 | 7.21 | 1.73 | 8.94 | 8.93 | Rounding |
| Connecticut | 2019 | 9.08 | 1.42 | 10.50 | 10.50 | Match |
| Delaware | 2023 | 20.62 | 2.18 | 22.80 | 22.80 | Match |
| Delaware | 2022 | 18.61 | 3.83 | 22.44 | 22.43 | Rounding |
| Delaware | 2019 | 11.04 | 2.12 | 13.16 | 13.16 | Match |
| Dist. of Col. | 2023 | 17.65 | 2.61 | 20.26 | 20.26 | Match |
| Dist. of Col. | 2022 | 14.55 | 4.40 | 18.95 | 18.95 | Match |
| Dist. of Col. | 2019 | 13.30 | 2.44 | 15.74 | 15.74 | Match |
| Florida | 2023 | 11.69 | 0.91 | 12.60 | 12.60 | Match |
| Florida | 2022 | 7.45 | 1.15 | 8.60 | 8.59 | Rounding |
| Florida | 2019 | 4.56 | 0.77 | 5.33 | 5.33 | Match |
| Georgia | 2023 | 9.68 | 2.39 | 12.07 | 12.07 | Match |
| Georgia | 2022 | 11.75 | 3.23 | 14.98 | 14.98 | Match |
| Georgia | 2019 | 7.45 | 1.85 | 9.30 | 9.30 | Match |
| Guam | 2023 | 15.22 | 2.79 | 18.01 | 18.01 | Match |
| Guam | 2022 | 12.68 | 3.63 | 16.31 | 16.31 | Match |
| Guam | 2019 | 9.74 | 2.15 | 11.89 | 11.89 | Match |
| Hawaii | 2023 | 18.73 | 2.21 | 20.94 | 20.94 | Match |
| Hawaii | 2022 | 19.65 | 2.13 | 21.78 | 21.78 | Match |

| State/Territory | Fiscal Year | Overpayment Rate (%) | Underpayment Rate (%) | Calculated Sum (OP+UP) | Reported Total PER | Verification Status |
|-----------------|-------------|----------------------|-----------------------|------------------------|--------------------|---------------------|
| Hawaii | 2019 | 4.45 | 1.76 | 6.21 | 6.21 | Match |
| Idaho | 2023 | 3.20 | 0.22 | 3.42 | 3.42 | Match |
| Idaho | 2022 | 3.26 | 0.18 | 3.44 | 3.44 | Match |
| Idaho | 2019 | 1.02 | 0.23 | 1.25 | 1.25 | Match |
| Illinois | 2023 | 8.87 | 1.04 | 9.91 | 9.91 | Match |
| Illinois | 2022 | 9.67 | 1.24 | 10.91 | 10.91 | Match |
| Illinois | 2019 | 7.42 | 1.41 | 8.83 | 8.84 | Rounding |
| Indiana | 2023 | 8.91 | 1.55 | 10.46 | 10.46 | Match |
| Indiana | 2022 | 6.59 | 2.10 | 8.69 | 8.69 | Match |
| Indiana | 2019 | 7.69 | 1.51 | 9.20 | 9.20 | Match |
| Iowa | 2023 | 4.29 | 0.90 | 5.19 | 5.19 | Match |
| Iowa | 2022 | 6.78 | 1.82 | 8.60 | 8.60 | Match |
| Iowa | 2019 | 10.78 | 1.68 | 12.46 | 12.47 | Rounding |
| Kansas | 2023 | 11.41 | 0.66 | 12.07 | 12.07 | Match |
| Kansas | 2022 | 8.74 | 0.33 | 9.07 | 9.07 | Match |
| Kansas | 2019 | 6.59 | 0.51 | 7.10 | 7.10 | Match |
| Kentucky | 2023 | 6.01 | 1.26 | 7.27 | 7.27 | Match |
| Kentucky | 2022 | 5.05 | 0.78 | 5.83 | 5.83 | Match |
| Kentucky | 2019 | 5.91 | 1.20 | 7.11 | 7.11 | Match |
| Louisiana | 2023 | 5.68 | 0.97 | 6.65 | 6.65 | Match |
| Louisiana | 2022 | 6.00 | 1.20 | 7.20 | 7.19 | Rounding |
| Louisiana | 2019 | 3.26 | 0.53 | 3.79 | 3.79 | Match |
| Maine | 2023 | 12.33 | 1.15 | 13.48 | 13.48 | Match |
| Maine | 2022 | 13.59 | 1.27 | 14.86 | 14.86 | Match |
| Maine | 2019 | 15.66 | 3.46 | 19.12 | 19.12 | Match |
| Maryland | 2023 | 16.92 | 2.06 | 18.98 | 18.98 | Match |
| Maryland | 2022 | 32.65 | 2.91 | 35.56 | 35.56 | Match |
| Maryland | 2019 | 6.82 | 1.61 | 8.43 | 8.43 | Match |
| Massachusetts | 2023 | 8.57 | 1.29 | 9.86 | 9.86 | Match |
| Massachusetts | 2022 | 10.77 | 1.00 | 11.77 | 11.77 | Match |
| Massachusetts | 2019 | 3.96 | 0.93 | 4.89 | 4.89 | Match |
| Michigan | 2023 | 8.54 | 2.18 | 10.72 | 10.72 | Match |
| Michigan | 2022 | 10.22 | 2.78 | 13.00 | 13.00 | Match |
| Michigan | 2019 | 9.71 | 2.73 | 12.44 | 12.44 | Match |
| Minnesota | 2023 | 7.20 | 2.05 | 9.25 | 9.25 | Match |
| Minnesota | 2022 | 5.49 | 2.75 | 8.24 | 8.24 | Match |
| Minnesota | 2019 | 7.83 | 1.94 | 9.77 | 9.78 | Rounding |
| Mississippi | 2023 | 5.86 | 1.58 | 7.44 | 7.44 | Match |
| Mississippi | 2022 | 6.63 | 1.16 | 7.79 | 7.79 | Match |

| State/Territory | Fiscal Year | Overpayment Rate (%) | Underpayment Rate (%) | Calculated Sum (OP+UP) | Reported Total PER | Verification Status |
|-----------------|-------------|----------------------|-----------------------|------------------------|--------------------|---------------------|
| Mississippi | 2019 | 5.30 | 1.27 | 6.57 | 6.57 | Match |
| Missouri | 2023 | 13.01 | 1.11 | 14.12 | 14.12 | Match |
| Missouri | 2022 | 12.02 | 1.01 | 13.03 | 13.03 | Match |
| Missouri | 2019 | 5.05 | 0.87 | 5.92 | 5.92 | Match |
| Montana | 2023 | 7.50 | 2.16 | 9.66 | 9.66 | Match |
| Montana | 2022 | 7.71 | 2.26 | 9.97 | 9.97 | Match |
| Montana | 2019 | 5.32 | 1.96 | 7.28 | 7.29 | Rounding |
| Nebraska | 2023 | 5.76 | 1.20 | 6.96 | 6.96 | Match |
| Nebraska | 2022 | 6.39 | 0.95 | 7.34 | 7.34 | Match |
| Nebraska | 2019 | 4.77 | 0.78 | 5.55 | 5.55 | Match |
| Nevada | 2023 | 6.53 | 1.30 | 7.83 | 7.83 | Match |
| Nevada | 2022 | 6.10 | 1.12 | 7.22 | 7.22 | Match |
| Nevada | 2019 | 6.10 | 0.59 | 6.69 | 6.69 | Match |
| New Hampshire | 2023 | 9.21 | 1.33 | 10.54 | 10.54 | Match |
| New Hampshire | 2022 | 7.71 | 4.63 | 12.34 | 12.34 | Match |
| New Hampshire | 2019 | 6.70 | 1.83 | 8.53 | 8.53 | Match |
| New Jersey | 2023 | 6.13 | 1.16 | 7.29 | 7.29 | Match |
| New Jersey | 2022 | 4.92 | 1.32 | 6.24 | 6.24 | Match |
| New Jersey | 2019 | 5.21 | 3.26 | 8.47 | 8.47 | Match |
| New Mexico | 2023 | 10.96 | 0.98 | 11.94 | 11.94 | Match |
| New Mexico | 2022 | 11.39 | 1.04 | 12.43 | 12.43 | Match |
| New Mexico | 2019 | 7.32 | 2.02 | 9.34 | 9.34 | Match |
| New York | 2023 | 11.75 | 0.91 | 12.66 | 12.66 | Match |
| New York | 2022 | 10.35 | 2.54 | 12.89 | 12.89 | Match |
| New York | 2019 | 5.94 | 0.37 | 6.31 | 6.30 | Rounding |
| North Carolina | 2023 | 9.20 | 1.58 | 10.78 | 10.78 | Match |
| North Carolina | 2022 | 17.44 | 1.63 | 19.07 | 19.07 | Match |
| North Carolina | 2019 | 4.20 | 1.59 | 5.79 | 5.78 | Rounding |
| North Dakota | 2023 | 10.78 | 1.38 | 12.16 | 12.16 | Match |
| North Dakota | 2022 | 8.06 | 1.45 | 9.51 | 9.51 | Match |
| North Dakota | 2019 | 3.95 | 0.96 | 4.91 | 4.92 | Rounding |
| Ohio | 2023 | 6.16 | 0.96 | 7.12 | 7.12 | Match |
| Ohio | 2022 | 6.14 | 0.96 | 7.10 | 7.10 | Match |
| Ohio | 2019 | 6.56 | 1.48 | 8.04 | 8.04 | Match |
| Oklahoma | 2023 | 7.82 | 1.12 | 8.94 | 8.94 | Match |
| Oklahoma | 2022 | 7.67 | 1.22 | 8.89 | 8.89 | Match |

| State/Territory | Fiscal Year | Overpayment Rate (%) | Underpayment Rate (%) | Calculated Sum (OP+UP) | Reported Total PER | Verification Status |
|-----------------|-------------|----------------------|-----------------------|------------------------|--------------------|---------------------|
| Oklahoma | 2019 | 7.03 | 1.06 | 8.09 | 8.09 | Match |
| Oregon | 2023 | 24.38 | 1.68 | 26.06 | 26.06 | Match |
| Oregon | 2022 | 21.76 | 1.23 | 22.99 | 22.99 | Match |
| Oregon | 2019 | 8.93 | 0.81 | 9.74 | 9.74 | Match |
| Pennsylvania | 2024 | 11.85 | 1.67 | 13.52 | 13.52 | Match |
| Pennsylvania | 2023 | 12.92 | 1.90 | 14.82 | 14.82 | Match |
| Pennsylvania | 2022 | 12.54 | 1.91 | 14.45 | 14.44 | Rounding |
| Pennsylvania | 2019 | 5.83 | 1.17 | 7.00 | 7.01 | Rounding |
| Rhode Island | 2023 | 14.99 | 1.83 | 16.82 | 16.82 | Match |
| Rhode Island | 2022 | 12.18 | 2.41 | 14.59 | 14.59 | Match |
| Rhode Island | 2019 | 21.57 | 1.09 | 22.66 | 22.66 | Match |
| South Carolina | 2023 | 7.60 | 1.82 | 9.42 | 9.42 | Match |
| South Carolina | 2022 | 7.49 | 1.70 | 9.19 | 9.19 | Match |
| South Carolina | 2019 | 4.11 | 0.98 | 5.09 | 5.09 | Match |
| South Dakota | 2023 | 3.32 | 0.38 | 3.70 | 3.70 | Match |
| South Dakota | 2022 | 2.68 | 0.39 | 3.07 | 3.07 | Match |
| South Dakota | 2019 | 1.91 | 0.50 | 2.41 | 2.41 | Match |
| Tennessee | 2023 | 12.96 | 1.06 | 14.02 | 14.02 | Match |
| Tennessee | 2022 | 19.04 | 0.75 | 19.79 | 19.79 | Match |
| Tennessee | 2019 | 5.88 | 0.84 | 6.72 | 6.72 | Match |
| Texas | 2023 | 7.50 | 2.22 | 9.72 | 9.72 | Match |
| Texas | 2022 | 5.26 | 2.60 | 7.86 | 7.86 | Match |
| Texas | 2019 | 5.18 | 1.43 | 6.61 | 6.60 | Rounding |
| Utah | 2023 | 5.56 | 0.91 | 6.47 | 6.47 | Match |
| Utah | 2022 | 5.58 | 1.03 | 6.61 | 6.61 | Match |
| Utah | 2019 | 3.62 | 0.71 | 4.33 | 4.33 | Match |
| Vermont | 2023 | 8.54 | 1.75 | 10.29 | 10.29 | Match |

| Vermont | 2022 | 4.10 | 0.47 | 4.57 | 4.57 | Match || Vermont | 2019 | 2.56 | 0.45 | 3.01 | 3.01 | Match || Virgin Islands | 2024 | 3.00 | 0.54 | 3.54 | 3.54 | Match || Virgin Islands | 2022 | 5.95 | 1.28 | 7.23 | 7.22 | Rounding || Virgin Islands | 2019 | 5.28 | 1.49 | 6.77 | 6.76 | Rounding || Virginia | 2024 | 9.54 | 1.96 | 11.50 | 11.50 | Match || Virginia | 2023 | 8.15 | 1.71 | 9.86 | 9.86 | Match || Virginia | 2022 | 7.66 | 1.68 | 9.34 | 9.34 | Match || Virginia | 2019 | 9.65 | 0.87 | 10.52 | 10.52 | Match || Washington | 2024 | 5.79 | 0.26 | 6.05 | 6.06 | Rounding || Washington | 2023 | 5.67 | 1.07 | 6.74 | 6.74 | Match || Washington | 2022 | 8.65 | 0.68 | 9.33 | 9.33 | Match || Washington | 2019 | 4.10 | 0.78 | 4.88 | 4.88 | Match || West Virginia | 2024 | 8.57 | 0.86 | 9.43 | 9.43 | Match || West Virginia | 2023 | 9.83 | 1.15 | 10.98 | 10.98 | Match || West Virginia | 2022 | 7.56 | 1.79 | 9.35 | 9.35 | Match || West Virginia | 2019 | 5.66 | 1.78 | 7.44 | 7.44 | Match ||

Wisconsin | 2024 | 3.81 | 0.66 | 4.47 | 4.47 | Match || Wisconsin | 2023 | 4.74 | 0.41 | 5.15 | 5.15 | Match || Wisconsin | 2022 | 3.81 | 0.58 | 4.39 | 4.39 | Match || Wisconsin | 2019 | 4.64 | 0.76 | 5.40 | 5.40 | Match || Wyoming | 2024 | 3.27 | 1.85 | 5.12 | 5.12 | Match || Wyoming | 2023 | 4.33 | 0.86 | 5.19 | 5.19 | Match || Wyoming | 2022 | 3.44 | 0.86 | 4.30 | 4.30 | Match || Wyoming | 2019 | 2.25 | 0.17 | 2.42 | 2.42 | Match |

Sources:

C. Verification Findings and Compositional Analysis

The "double check" is complete. The component rates for overpayments and underpayments consistently and reliably sum to the reported total Payment Error Rate. The minor, infrequent deviations of 0.01% are fully and consistently explained by the official FNS rounding disclaimer. This verification, however, reveals a crucial and consistent pattern in the *composition* of the errors. Overpayment errors are the dominant component of the PER.

- In **FY 2024**, the national Overpayment Rate was 9.26%, while the Underpayment Rate was 1.67%.
- In **FY 2023**, the national Overpayment Rate was 10.03%, while the Underpayment Rate was 1.64%.
- In **FY 2022**, the national Overpayment Rate was 9.84%, while the Underpayment Rate was 1.70%.
- In **FY 2019**, the national Overpayment Rate was 6.18%, while the Underpayment Rate was 1.18%.

At the national level, overpayments are consistently five to six times more prevalent than underpayments. This compositional imbalance makes the SNAP program politically vulnerable. While the PER is a technical measure of *accuracy* and not *fraud*, the public and political discourse often conflates "error" with "fraud" or "waste."

A \$10.5 billion national error rate that is *perceived* as being 85-90% "waste" (the overpayment share) creates significant political headwinds for program funding and administrative support. This can make it more difficult for state agencies to secure the resources needed to hire staff, modernize technology, and conduct the training necessary to fix the very errors being criticized, creating a negative feedback loop of under-resourcing and poor performance.

IV. Longitudinal Analysis of Case and Procedural Error Rates (CAPER) (FY 2015-2024)

This section fulfills the request for CAPER data, analyzing the second major metric of administrative performance: errors in *negative* case actions (i.e., denials and terminations).

A. Defining the Case and Procedural Error Rate (CAPER)

While the PER assesses the accuracy of *active* cases, the CAPER assesses the accuracy and procedural compliance of state agency actions when a household is *denied* SNAP benefits, or has its benefits *terminated* or *suspended*.

Critically, CAPER reflects two distinct types of failures:

1. **Accuracy of the Action:** Was the state agency's decision to deny or terminate the household's benefits correct based on federal regulations?
2. **Procedural Compliance:** Did the state agency comply with federal procedural

requirements? This includes the timeliness of the action and, most importantly, the adequacy of the notice sent to the household. For example, a procedural error occurs if the denial notice is not clear, does not include specific required language, or is not sent within the required timeframe.

B. National CAPER Trends: A Doubling of Procedural Failures

The longitudinal data for the national CAPER shows a more dramatic and sustained increase than the PER. The national average CAPER has nearly doubled since FY 2015.

- **FY 2015:** 23.27%
- **FY 2016:** 23.27%
- **FY 2017:** 28.55%
- **FY 2018:** 37.73%
- **FY 2019:** 34.01%
- **FY 2022:** 44.12%
- **FY 2023:** 44.52%
- **FY 2024 (as of July 2024):** 43.81%

This trend indicates a massive, systemic erosion in the ability of state agencies to correctly or procedurally handle case denials and terminations. A national average rate of 44.52% in FY 2023 suggests that nearly half of all negative actions taken by state agencies are flawed, either in their determination or in the federally-mandated process of communicating that action to the household.

C. The "Moving Goalpost": A Critical Policy Shift and its Implications

The data on CAPER accountability reveals a crucial policy shift that has significant implications for oversight.

- **Prior to FY 2017:** Federal regulations at 7 CFR 275.16 required a state to implement a Corrective Action Plan (CAP) if its negative error rate was above **1%**.
- **The Problem:** The modern CAPER metric, which was expanded in FY 2012 to include the complex procedural and customer-service aspects (like notice clarity), caused error rates to skyrocket. The 1% threshold became obsolete, as it would have required nearly all states to take corrective action every year, rendering the tool useless for targeting oversight.
- **The Change (July 12, 2016):** FNS issued a new memorandum establishing a new threshold. Effective FY 2017, a CAPER CAP is required only for states with a CAPER *above the national average*.

While this policy shift may have been pragmatic, it has created a "moving goalpost" that systematically *weakens* accountability as overall performance degrades. The accountability threshold is no longer a fixed, objective standard (like 1% or 6%). It is now *relative* to a national average that is itself rising dramatically.

For example, in FY 2017, a state needed to keep its CAPER below 28.55% to avoid a federally-mandated CAP. By FY 2023, a state could have a CAPER of **44%**—a rate demonstrating that nearly half of its denials and terminations are procedurally or determinationally flawed—and *still not* be required to submit a CAP, so long as it remained below the new, higher national average of 44.52%.

This mechanism has been cited by advocacy groups for "substantially weaken[ing] the threshold for states to adopt corrective action plans" and removing "structural incentives to respond". The

system is effectively grading on a curve, and the entire class's average score is falling.

D. State-Level Data Table

The following table provides the comprehensive, longitudinal state-by-state CAPER data from FY 2015 to FY 2023, as requested.

Key Table 2: Longitudinal State-by-State Case and Procedural Error Rates (CAPER) (FY 2015-2023)

| State/Territory | FY 2015 | FY 2016 | FY 2017 | FY 2018 | FY 2019 | FY 2022 | FY 2023 |
|-------------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|
| U.S. Total | 23.27 | 23.27 | 28.55 | 37.73 | 34.01 | 44.12 | 44.52 |
| Alabama | 9.80 | 4.87 | 22.20 | 56.52 | 43.66 | 32.53 | 32.06 |
| Alaska | 40.82 | 37.64 | 45.54 | 39.42 | 38.98 | 56.08 | 87.10 |
| Arizona | 31.35 | 28.23 | 34.51 | 35.84 | 32.70 | 35.92 | 29.92 |
| Arkansas | 16.12 | 26.02 | 36.03 | 31.88 | 28.64 | 54.85 | 68.09 |
| California | 36.02 | 36.77 | 38.99 | 60.92 | 34.30 | 39.60 | 39.94 |
| Colorado | 40.33 | 24.33 | 25.73 | 24.68 | 27.60 | 39.12 | 40.55 |
| Connecticut | 12.21 | 26.43 | 31.38 | 41.73 | 58.14 | 34.43 | 37.29 |
| Delaware | 25.44 | 38.87 | 30.37 | 33.15 | 26.14 | 76.27 | 83.93 |
| Dist. of Col. | 23.34 | 30.69 | 70.14 | 91.33 | 61.73 | 80.46 | 58.79 |
| Florida | 7.18 | 12.39 | 23.50 | 21.00 | 20.43 | 51.71 | 62.96 |
| Georgia | 42.73 | 48.88 | 58.12 | 88.56 | 87.42 | 74.82 | 82.40 |
| Guam | 40.80 | 74.06 | 66.68 | 68.77 | 74.88 | 61.34 | 77.97 |
| Hawaii | 23.17 | 28.36 | 36.35 | 37.74 | 36.76 | 58.15 | 61.69 |
| Idaho | 7.58 | 12.51 | 7.09 | 7.96 | 9.08 | 11.03 | 16.50 |
| Illinois | 13.47 | 31.92 | 22.06 | 54.71 | 51.43 | 45.53 | 47.34 |
| Indiana | 21.38 | 27.18 | 34.31 | 44.00 | 42.43 | 39.03 | 38.80 |
| Iowa | 12.75 | 10.20 | 12.21 | 17.33 | 19.49 | 29.65 | 33.18 |
| Kansas | 12.78 | 10.53 | 14.27 | 36.60 | 33.42 | 35.06 | 49.06 |
| Kentucky | 19.95 | 51.84 | 55.72 | 66.45 | 57.62 | 79.67 | 64.00 |
| Louisiana | 20.97 | 26.92 | 29.68 | 33.24 | 34.74 | 58.57 | 23.88 |
| Maine | 31.16 | 36.63 | 37.87 | 49.92 | 64.24 | 48.42 | 53.41 |
| Maryland | 20.98 | 20.24 | 20.38 | 37.07 | 28.39 | 55.48 | 43.63 |
| Massachusetts | 19.83 | 25.48 | 23.50 | 31.98 | 36.80 | 23.55 | 23.10 |
| Michigan | | | | | | 29.86 | 25.93 |
| | 33.26 | 34.38 | 36.05 | 47.08 | 51.27 | | |
| Minnesota | | | | 24.08 | 29.50 | 27.70 | 49.22 |
| | | | | | | 48.96 | 31.79 |
| Mississippi | | | | 25.18 | | | |
| | 6.60 | 10.24 | 16.92 | 62.01 | 46.27 | 47.32 | 50.98 |
| Missouri | | | | | | 20.35 | |
| | 13.75 | 15.79 | 22.51 | 13.49 | 16.74 | 17.20 | |
| Montana | | | | | 37.12 | 46.00 | 30.95 |
| | | | | | | 33.16 | 30.39 |
| Nebraska | | | | 44.54 | 31.03 | | |
| | 10.09 | 9.26 | 7.09 | 8.81 | 17.27 | 13.96 | 12.77 |
| Nevada | | | | | | 22.06 | |
| | 24.32 | 20.38 | 51.43 | 35.50 | 28.72 | 36.95 | |
| New Hampshire | | | | | | 8.77 | 9.60 |
| | | | | | | 8.59 | 28.20 |
| | | | | | | | 30.96 |
| New Jersey | | | | 46.12 | 55.84 | | |
| | 46.72 | 40.07 | 33.58 | 33.48 | 37.64 | 47.71 | 41.03 |
| New Mexico | | | | | | 22.16 | |
| | 53.18 | 48.68 | 49.57 | 32.51 | 15.32 | 45.34 | 70.29 |
| New York | | | | | | 29.19 | 23.96 |
| | | | | | | | 25.87 |
| North Carolina | | | | 31.93 | 37.64 | 45.26 | 47.15 |
| | | | | | | 55.27 | 40.29 |
| | | | | | | 29.81 | 31.56 |
| | | | | | | 41.06 | 35.83 |
| North Dakota | | | | 38.65 | | | |
| | 20.83 | 18.38 | 20.23 | 16.49 | 25.09 | 34.10 | 57.77 |
| Oklahoma | | | | | | 15.71 | 18.26 |
| | 20.93 | 22.98 | 48.35 | 49.21 | 34.76 | 40.82 | |
| Pennsylvania | | | | | | 18.06 | 17.60 |
| | 26.28 | 31.44 | | | | 15.10 | |
| Oregon | | | | | | 21.99 | |
| | 20.59 | 20.57 | | | | 21.71 | |
| | | | | | | 25.77 | |
| | | | | | | 46.03 | |
| | | | | | | 38.86 | |
| | | | | | | Pennsylvania | |

41.68 | 26.60 | 22.38 | 19.49 | 23.80 | 38.59 | 29.42 | | Rhode Island | 14.24 | 7.36 | 63.39 | 35.89
| 58.11 | 41.60 | 55.41 || | South Carolina | 8.07 | 9.98 | 14.45 | 32.76 | 13.96 | 79.63 | 80.88 ||
South Dakota | 1.91 | 2.50 | 2.32 | 2.18 | 5.04 | 8.41 | 9.34 || | Tennessee | 11.62 | 10.53 | 16.64 |
30.79 | 23.40 | 29.60 | 37.41 || | Texas | 13.52 | 14.19 | 14.52 | 21.63 | 33.54 | 44.31 | 50.28 ||
Utah | 10.19 | 13.92 | 22.21 | 19.76 | 23.60 | 24.58 | 28.33 || | Vermont | 22.26 | 19.89 | 23.30 |
25.48 | 26.14 | 33.03 | 26.10 || | Virgin Islands | 25.48 | 33.66 | 14.87 | 16.62 | 15.30 | 41.91 |
68.72 || | Virginia | 36.54 | 39.35 | 47.19 | 43.84 | 35.81 | 47.06 | 45.83 || | Washington | 9.76 |
10.88 | 12.67 | 20.73 | 16.91 | 29.65 | 26.69 || | West Virginia | 15.93 | 13.59 | 16.29 | 22.00 |
18.83 | 28.95 | 28.66 || | Wisconsin | 27.02 | 24.46 | 23.15 | 30.19 | 30.06 | 33.34 | 21.84 ||
Wyoming | 20.09 | 13.90 | 21.46 | 14.51 | 14.61 | 11.05 | 17.72 |

Sources:

V. Assessment of Application Processing Timeliness (APT) (FY 2015-2023)

This section adds the final requested data layer, analyzing the speed of state operations. This provides a critical counter-balance to the *accuracy* metrics (PER and CAPER) and reveals the central operational tension facing state agencies.

A. Defining Application Processing Timeliness (APT)

The Application Processing Timeliness (APT) rate is the FNS measure of a state agency's compliance with the processing timeframes mandated by the Food and Nutrition Act. Federal law establishes two standards for application processing:

1. **Expedited Service:** Households eligible for expedited service (e.g., those with very low income and resources) must be given the opportunity to participate (i.e., receive benefits) within **7 days** of their application date.
2. **Standard Service:** All other eligible households must be given the opportunity to participate within **30 days** of their application date.

The FNS-calculated APT rate, derived from QC review data, represents the percentage of applications processed "on time" according to these two standards. As with the other QC-derived metrics, FNS did not calculate official APT rates for FY 2020 or FY 2021 due to the suspension of QC requirements during the public health emergency.

B. FNS Timeliness Standards and Corrective Action

FNS has established a three-tiered performance standard for state APT rates, which is used to escalate federal oversight.:

- **95% and above:** "Timely" (Acceptable performance)
- **90% to 94.99%:** "Untimely"
- **Below 90%:** "Very Untimely"

States with "Very Untimely" performance (i.e., an APT rate below 90%) are required to develop and implement a Corrective Action Plan (CAP). This mandate creates the central operational tension for state SNAP administrators.

C. The "Administrative Squeeze" Effect

The analysis of all three metrics reveals a critical operational conflict, which can be termed the "Administrative Squeeze." State agencies are caught between two conflicting federal mandates.

1. **Mandate 1 (Accuracy):** A state must keep its Payment Error Rate (PER) *below 6%* or face a mandatory CAP.
2. **Mandate 2 (Speed):** A state must keep its Application Processing Timeliness (APT) rate *above 90%* or face a mandatory CAP.

These two goals are operationally in direct tension. Improving accuracy (to lower the PER) often requires *more* time. This includes more thorough verification of income and expenses, more detailed secondary reviews by supervisors, and more time spent with applicants during interviews. These actions inherently *slow down* processing, which risks a state's APT rate falling below the 90% "Very Untimely" threshold.

Conversely, improving speed (to raise the APT) may pressure staff to rush applications, cut corners on verification, and make more data-entry or calculation mistakes. This haste can directly *increase* the Payment Error Rate, pushing a state over the 6% PER threshold.

States are, therefore, being simultaneously penalized by the federal government for being too slow *and* for being too inaccurate. Achieving both speed and accuracy concurrently is possible, but it requires significant resources: high staffing levels to maintain low caseloads, robust and continuous training, and modern, efficient IT systems.

However, the administrative reality for many states is one of constraints. "Limited staffing" was explicitly cited as a primary challenge by state agencies during the CAP development process. The federal oversight model is, in effect, demanding that resource-strapped states solve this speed-versus-accuracy dilemma, and the data—rising PER, rising CAPER, and chronically low APT in many states—is the evidence of this unresolved systemic tension.

D. State-Level Data and Trends

The challenge of meeting timeliness standards is not new. FNS data from FY 2015 shows that 19 of 51 states and territories were already in the "Very Untimely" category. Recent data shows this problem persists with extreme variance among states. The FY 2023 APT rates, for example, range from a high of 98.15% in Idaho to a low of 48.13% in the District of Columbia.

A 2024 analysis of FNS data from FY 2017 through FY 2022 identified 14 states with "consistently low timeliness rates" (i.e., below 90%) for three or more years during that period. This list of states with chronic delays includes Georgia, Tennessee, Florida, and New York, among others.

E. State-Level Data Table

The following table provides the comprehensive, longitudinal state-by-state APT data for FY 2015, 2017, 2018, 2022, and 2023. Data tables for FY 2016 and FY 2019 were not available in the provided materials.

Key Table 3: Longitudinal State-by-State Application Processing Timeliness (APT) Rates (FY 2015-2023)

| State/Territory | FY 2015 | FY 2017 | FY 2018 | FY 2022 | FY 2023 | FY23 FNS Status |
|-----------------|---------|---------|---------|---------|---------|-----------------|
| Alabama | 95.60 | 97.25 | 92.75 | 89.68 | 94.30 | Untimely |
| Alaska | N/A | 82.65 | 91.21 | 93.51 | 38.98 | Very Untimely |

| State/Territory | FY 2015 | FY 2017 | FY 2018 | FY 2022 | FY 2023 | FY23 FNS Status |
|-----------------|---------|---------|---------|---------|---------|-----------------|
| Arizona | 92.93 | 93.49 | 90.37 | 90.46 | 91.47 | Untimely |
| Arkansas | 93.26 | 82.47 | 87.03 | 75.20 | 67.38 | Very Untimely |
| California | 89.26 | 93.22 | 94.79 | 79.84 | 82.07 | Very Untimely |
| Colorado | 94.13 | 97.37 | 90.15 | 74.22 | 74.91 | Very Untimely |
| Connecticut | 94.35 | 97.95 | 96.47 | 93.07 | 93.81 | Untimely |
| Delaware | N/A | 96.32 | 93.01 | 79.41 | 89.72 | Very Untimely |
| Dist. of Col. | 95.08 | 86.34 | 93.79 | 42.86 | 48.13 | Very Untimely |
| Florida | 94.57 | 96.62 | 96.44 | 72.92 | 64.38 | Very Untimely |
| Georgia | 88.00 | 89.57 | 75.22 | 68.00 | 78.09 | Very Untimely |
| Guam | N/A | 69.64 | 62.26 | 65.93 | 61.27 | Very Untimely |
| Hawaii | 94.43 | 95.28 | 98.50 | 77.04 | 75.35 | Very Untimely |
| Idaho | 99.13 | 99.66 | 99.19 | 100.00 | 98.15 | Timely |
| Illinois | 88.66 | 86.40 | 69.63 | 96.09 | 95.85 | Timely |
| Indiana | 90.26 | 96.00 | 91.85 | 84.80 | 78.17 | Very Untimely |
| Iowa | 89.92 | 86.96 | 87.54 | 78.34 | 77.73 | Very Untimely |
| Kansas | N/A | 94.42 | 91.77 | 74.03 | 81.28 | Very Untimely |
| Kentucky | 94.03 | 92.47 | 90.66 | 89.86 | 76.14 | Very Untimely |
| Louisiana | 90.15 | 94.76 | 94.93 | 92.94 | 94.12 | Untimely |
| Maine | 88.68 | 92.31 | 86.21 | 90.70 | 88.89 | Very Untimely |
| Maryland | 89.94 | 88.24 | 87.54 | 89.16 | 84.80 | Very Untimely |
| Massachusetts | N/A | 92.18 | 92.56 | 93.63 | 85.91 | Very Untimely |
| Michigan | 90.13 | 88.89 | 93.70 | 82.72 | 77.66 | Very Untimely |
| Minnesota | 93.93 | 92.42 | 92.83 | 87.98 | 85.89 | Very Untimely |
| Mississippi | 92.50 | 91.40 | 89.07 | 81.00 | 83.25 | Very Untimely |
| Missouri | N/A | 95.67 | 95.26 | 77.21 | 85.32 | Very |

| State/Territory | FY 2015 | FY 2017 | FY 2018 | FY 2022 | FY 2023 | FY23 FNS Status |
|-----------------|---------|---------|---------|---------|---------|-----------------|
| | | | | | | Untimely |
| Montana | 93.71 | 95.24 | 94.04 | 86.61 | 74.76 | Very Untimely |
| Nebraska | 90.68 | 93.67 | 95.92 | 89.22 | 91.20 | Untimely |
| Nevada | 91.15 | 95.63 | 96.68 | 96.48 | 93.58 | Untimely |
| New Hampshire | 96.94 | 97.08 | 93.79 | 92.63 | 91.67 | Untimely |
| New Jersey | 89.43 | 85.87 | 81.36 | 95.21 | 82.08 | Very Untimely |
| New Mexico | 98.63 | 97.67 | 98.68 | 92.42 | 66.34 | Very Untimely |
| New York | 87.35 | 90.77 | 88.59 | 71.08 | 60.45 | Very Untimely |
| North Carolina | N/A | 96.56 | 92.51 | 94.42 | 91.98 | Untimely |
| North Dakota | 96.38 | 92.72 | 93.85 | 75.78 | 52.94 | Very Untimely |
| Ohio | 88.35 | 91.85 | 85.77 | 93.16 | 92.54 | Untimely |
| Oklahoma | 95.16 | 93.11 | 93.60 | 87.88 | 89.54 | Very Untimely |
| Oregon | 95.54 | 94.33 | 96.06 | 74.46 | 79.84 | Very Untimely |
| Pennsylvania | 93.59 | 98.67 | 97.52 | 92.86 | 92.06 | Untimely |
| Rhode Island | 93.23 | 85.25 | 92.41 | 91.74 | 90.11 | Untimely |
| South Carolina | N/A | 86.19 | 83.91 | 84.88 | 71.49 | Very Untimely |
| South Dakota | 94.39 | 92.73 | 91.67 | 88.89 | 89.23 | Very Untimely |
| Tennessee | 90.53 | 81.12 | 78.44 | 82.99 | 70.48 | Very Untimely |
| Texas | N/A | 94.98 | 95.63 | 82.37 | 82.70 | Very Untimely |
| Utah | 95.71 | 97.78 | 94.18 | 96.77 | 96.35 | Timely |
| Vermont | 91.35 | 90.86 | 87.79 | 89.36 | 90.30 | Untimely |
| Virgin Islands | N/A | 87.50 | 91.89 | 67.27 | 75.44 | Very Untimely |
| Virginia | 91.48 | 87.23 | 88.09 | 89.11 | 87.73 | Very Untimely |
| Washington | 90.67 | 93.20 | 92.61 | 87.44 | 94.09 | Untimely |
| West Virginia | N/A | 87.01 | 95.59 | 83.59 | 82.61 | Very Untimely |
| Wisconsin | 93.33 | 96.15 | 97.39 | 97.74 | 97.45 | Timely |
| Wyoming | 96.32 | 95.95 | 94.59 | 94.68 | 92.31 | Untimely |

Sources:

VI. Integrated Analysis: Pennsylvania's Performance in Context

This section synthesizes all three data streams into a single performance dashboard for the Commonwealth of Pennsylvania. This provides the specific, local context for understanding the state's vulnerabilities and its response to the November 2025 crisis.

A. Pennsylvania Performance Dashboard (FY 2015-2023)

The following table extracts Pennsylvania's metrics from the datasets above and benchmarks them against the U.S. national figures and federal standards.

Key Table 4: Pennsylvania SNAP Performance Dashboard vs. National Average (FY 2015-2024)

| Metric | Jurisdiction | FY 2015 | FY 2017 | FY 2018 | FY 2019 | FY 2022 | FY 2023 | FY 2024 |
|---------------------|-----------------------------------|---------|---------|---------|---------|---------------|---------------|---------------|
| PER | Pennsylvania | N/A | N/A | N/A | 7.01% | 14.44% | 14.82% | 13.52% |
| (PER) | <i>U.S. Total</i> | N/A | N/A | N/A | 7.36% | 11.54% | 11.68% | 10.93% |
| (PER CAP Threshold) | <i>Federal Standard</i> | 6.00% | 6.00% | 6.00% | 6.00% | 6.00% | 6.00% | 6.00% |
| | | | | | | | | |
| CAPER | Pennsylvania | 41.68% | 22.38% | 19.49% | 23.80% | 38.59% | 29.42% | N/A |
| (CAPER) | <i>U.S. Total (CAP Threshold)</i> | 23.27% | 28.55% | 37.73% | 34.01% | 44.12% | 44.52% | 43.81% |
| | | | | | | | | |
| APT | Pennsylvania | 93.59% | 98.67% | 97.52% | N/A | 92.86% | 92.06% | N/A |
| (APT) | <i>FNS "Timely" Standard</i> | 95.00% | 95.00% | 95.00% | 95.00% | 95.00% | 95.00% | 95.00% |
| (APT CAP Threshold) | <i>Federal Standard</i> | <90.00% | <90.00% | <90.00% | <90.00% | <90.00% | <90.00% | <90.00% |

Sources:

B. Analysis of Pennsylvania's Performance Profile

The dashboard reveals a stark and consistent operational profile for the Commonwealth's SNAP program.

- **Payment Error Rate (PER):** Pennsylvania's performance on payment accuracy is a significant and growing liability. In FY 2019, its 7.01% rate was slightly better than the 7.36% national average. However, in the post-pandemic period, its error rate exploded. In FY 2022, PA's PER of **14.44%** was significantly higher than the already-high national average of 11.54%. This trend continued in FY 2023 (14.82% vs 11.68% US) and FY 2024 (13.52% vs 10.93% US). Pennsylvania is deep in non-compliance and squarely in the category of states requiring a PER Corrective Action Plan.
- **Case and Procedural Error Rate (CAPER):** Pennsylvania's story here is one of dramatic and sustained success. In FY 2015, the state's CAPER was a disastrous 41.68%, far above the 23.27% U.S. total. However, following the 2016 FNS policy change, Pennsylvania has successfully kept its CAPER *below* the rising national average in *every single year measured*. In FY 2023, its 29.42% rate was a full 15 percentage points *better* than the 44.52% U.S. total, meaning it is not required to implement a CAPER CAP.
- **Application Processing Timeliness (APT):** Pennsylvania has historically been a national leader in processing speed. It achieved "Timely" status with 98.67% in FY 2017 (ranking 2nd in the nation) and 97.52% in FY 2018 (ranking 4th). While its performance has since slipped into the "Untimely" category (92.86% in FY22 and 92.06% in FY23), it remains safely above the 90% "Very Untimely" threshold that would trigger a corrective action plan.

C. Synthesizing Pennsylvania's "Speed over Accuracy" Profile

The performance dashboard reveals Pennsylvania's clear operational tradeoff. The PA DHS administrative system is optimized for **SPEED** at the expense of **ACCURACY**.

The state's high APT rates and strong CAPER performance show a system that excels at its *procedural* and *timeliness* requirements. It successfully moves cases through the pipeline, avoids procedural errors on its denials, and processes new applications quickly enough to avoid federal sanction.

However, its extremely high PER (14.82% in FY23) shows that this speed comes at a significant cost. The system is making a large volume of *payment* errors on its *active* cases. This is a classic manifestation of the "Administrative Squeeze." The PA DHS has successfully avoided the "Very Untimely" APT Corrective Action Plan but has fallen deep into the PER Corrective Action Plan requirement.

This specific administrative profile—"fast but error-prone"—made the Commonwealth *exceptionally* vulnerable to the November 2025 shutdown. A system built for high-speed throughput, likely operating with minimal backlogs to maintain its high APT rate, cannot absorb the shock of a sudden, total, and unexpected funding halt. The administrative chaos and severe hardship witnessed in Philadelphia are the direct results of this high-speed, low-resilience system having its primary funding cut.

The challenge for PA DHS as of November 16, 2025, is therefore twofold: it must execute an emergency restart of this high-speed engine *and* attempt to do so accurately, a monumental task given its poor baseline payment accuracy.

VII. Key Findings and Strategic Recommendations

This analysis of federal performance data in the context of the November 2025 shutdown yields

four key findings and a set of actionable recommendations for Pennsylvania's leadership.

A. Summary of Key Findings

1. **Finding 1 (Data Verification):** The "double check" of Payment Error Rate data is complete. The FNS data is internally consistent and reliable. The Overpayment and Underpayment rates sum to the reported total PER, with minor, infrequent discrepancies fully attributable to FNS's stated rounding policy.
2. **Finding 2 (Systemic Fragility):** The national SNAP administrative system is in a state of historic fragility. In the post-pandemic era, the National PER (11.68% in FY 2023) and National CAPER (44.52% in FY 2023) are at or near unprecedented highs. This indicates a systemic, nationwide failure in both payment accuracy and procedural compliance.
3. **Finding 3 (Weakened Accountability):** A 2016 FNS policy change that ties CAPER corrective action to the "national average" rather than a fixed standard has created a perverse incentive. As the entire system's performance degrades, the bar for accountability is effectively lowered, masking the severity of the problem and removing incentives for improvement.
4. **Finding 4 (Pennsylvania's Profile):** Pennsylvania's administrative system is optimized for *speed* at the expense of *accuracy*. It has successfully managed its timeliness (APT) and procedural (CAPER) metrics to avoid federal sanctions on those fronts. However, it suffers from a very high Payment Error Rate (14.82% in FY 2023), making it one of the more error-prone systems in the nation for active cases. This "fast but inaccurate" profile made it uniquely vulnerable to the catastrophic funding shock of the November 2025 shutdown.

B. Strategic Recommendations for Pennsylvania Leadership

Based on this data, the following strategic actions are recommended:

Immediate Term (Crisis Communications & Management)

- **Reframe the Narrative:** The data in this report should be used in all public communications and federal briefings to frame the current crisis as a *federal failure*, not a *Pennsylvania* one. The evidence is clear: (1) The federal government created the shutdown; (2) The federal oversight body (FNS) has presided over a nationwide degradation of systemic health (Finding 2); and (3) Federal oversight policy has created conflicting "speed vs. accuracy" mandates (the "Administrative Squeeze") that put states in an impossible, resource-starved position.
- **Demand 100% Administrative Support:** The PA DHS is now executing an emergency restart of benefits for two million people. This *will* be administratively costly and will likely introduce new errors. The Commonwealth must demand 100% federal reimbursement for all administrative costs associated with this restart and recovery, citing the precedent of 100% State Administrative Expenses (SAE) funding provided during the COVID-19 pandemic.

Medium Term (Operational Corrective Action)

- **Address the PER:** Pennsylvania is in deep non-compliance with its PER (14.82% > 6% threshold). It *must* develop a PER CAP. This report's data (high APT, high PER) provides the "root cause" analysis for that CAP: the system is "running too fast" to maintain accuracy.
- **Develop a Resource-Based Solution:** The PER CAP submitted to FNS must focus on

securing federal funding (via 100% SAE or other grants) for (a) increased staffing to reduce caseloads, (b) enhanced, continuous training on eligibility, and (c) modernization of IT systems to automate verification. The Commonwealth must explicitly argue that it cannot fix its high PER *without* compromising its high-performing APT rate unless it receives these additional resources.

Long Term (Federal Advocacy)

- **Advocate for Objective, Funded Standards:** Use this data to join other states in lobbying FNS and Congress to reform the QC system. The state should advocate for a return to a *fixed, objective* CAPER threshold but *simultaneously* demand the federal administrative funding necessary to meet that standard.
- **Resolve the "Administrative Squeeze":** The state should lead advocacy for FNS to formally acknowledge the operational tension between PER and APT. Federal policy should be changed to *reward* states that successfully balance both, rather than just penalizing those who fail at one. This could include policy proposals such as providing higher "tolerance" thresholds for the PER to states that successfully meet the 95% "Timely" APT standard.

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