WRITTEN STATEMENT FOR THE RECORD

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ON BEHALF OF THE NATIONAL ASSOCIATION OF COUNTIES

EXPLORING STATE OPTIONS IN SNAP

BEFORE THE SUBCOMMITTEE ON NUTRITION AND FOREIGN AGRICULTURE

COMMITTEE ON AGRICULTURE

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Chair Finstad, Ranking Member Hayes and distinguished members of the Subcommittee, thank you for holding today's hearing on the challenges and importance of different state options to improve administration of the Supplemental Nutrition Assistance Program (SNAP). On behalf of the National Association of Counties (NACo) and the nation's 3,069 counties, parishes and boroughs that we represent, thank you for providing the opportunity to testify.

My name is Joy Bivens, and I serve as the Deputy County Administrator for Health and Human Services for Franklin County, Ohio. Franklin County is home to our state's capital, Columbus, and with over 1.3 million residents, it is the most populous county in Ohio. It is also one of the fastest growing counties in the state and the entire Midwest, as we expect to add another 430,000 residents by 2050. Along with being the largest county in Ohio, we are also one of the most diverse: about 24 percent of our population is African American, 5.7 percent is Asian-American and 6.8 percent is Latino. We are home to numerous Fortune-500 companies like Nationwide Insurance and Cardinal Health, as well as The Ohio State University. Among the county HHS agencies I oversee is our Department of Job and Family Services, which touches the lives of nearly a quarter of our residents, including over 183,000 Franklin County SNAP recipients—most of them (55 percent) children or seniors over the age of 65.

About NACo

Founded in 1935, NACo is the only national organization that represents county governments in the United States, bringing together county officials to advocate with a collective voice on national policy, exchange ideas and build new leadership skills, pursue transformational county solutions, enrich the public's understanding of county government and exercise exemplary leadership in public service.

About America's Counties

Counties are highly diverse, not only in my state of Ohio, but across the nation, and vary immensely in natural resources, social and political systems, cultural, economic and structural circumstances, as well as public health and environmental responsibilities. Of the nation's 3,069 counties, approximately 70 percent are considered "rural," with populations less than 50,000, and 50 percent of these have populations below 25,000. At the same time, there are more than 120 major urban counties, which collectively provide essential services to more than 130 million people each day.

While county responsibilities differ widely, most states grant counties significant authorities to fulfill public services. These authorities include construction and maintenance of roads, bridges and critical infrastructure, assessment of property taxes, record keeping, administering elections, and overseeing jails, court systems and public hospitals. Counties are also responsible for consumer protection, economic development, employment and workforce training, emergency management, land use planning and zoning.

Counties are deeply committed to promoting the health and well-being of residents. We collectively invest $62.8 billion annually to deliver vital social safety net services and programs to our nation’s most vulnerable populations. Additionally, we invest $100 billion in community health and hospitals annually, including more than $41 billion for the provision of community and public health services, and more than $59 billion in operating county-owned hospital facilities. Each day, counties deliver essential services that support vulnerable individuals and families, serving as a vital partner in the federal, state and local human services delivery system.

Today, I will discuss the following points for your consideration as the committee assesses challenges and opportunities regarding SNAP state options and administration:

1. **Strong federal support, sustainable funding and opportunities for innovation allow counties to deliver SNAP effectively without overburdening local resources.**
2. **Counties rely on flexible tools, such as Broad-Based Categorical Eligibility (BBCE) and the Standard Utility Allowance (SUA), to efficiently manage caseloads.**
3. **Work requirement waivers and SNAP E&T serve as effective means for counties to respond to local community needs and labor market conditions.**

Strong federal support, sustainable funding and opportunities for innovation allow counties to deliver SNAP effectively without overburdening local resources.

Counties serve on the front lines of delivering vital services to our residents to ensure healthy, safe and vibrant communities. Because county human services offices are embedded in the communities they serve, residents can access assistance close to home, and staff can make direct referrals to nearby nonprofits, faith-based organizations, and workforce partners. This proximity is especially critical for individuals with transportation barriers, disabilities, or unstable housing.

The Supplemental Nutrition Assistance Program (SNAP) is the nation’s largest anti-hunger program, providing vital food assistance to nearly 42 million people. Along with my state of Ohio, county governments in California, Colorado, Minnesota, New Jersey, New York, North Carolina, North Dakota, Virginia and Wisconsin county governments are responsible for the administration of SNAP. Recipients in these ten states represent approximately 34 percent of total participants, or 14.6 million people.

Within these states, county agencies determine eligibility, process and recertify applications, collect and report data, hire and train staff, and manage client communications. Specific responsibilities vary by state law and by the design of state technology systems and policies. Where states permit counties greater operational flexibility, counties have deployed innovations that improve outcomes. For example, Greene County, New York piloted an AI assistant to help residents navigate eligibility and documentation requirements, improving timeliness and customer service.

In nine out of the ten county-administered SNAP states, counties must partially or fully cover the non-federal administrative match. North Carolina, New York and New Jersey require counties to fund the entire non-federal share, while California, Colorado, Minnesota, Ohio, Virginia and Wisconsin share the obligation with the state. Only in North Dakota does the state fully cover the non-federal match.

The *One Big Beautiful Bill Act (OBBBA)* (P.L. 119-21) reduced the federal share of the SNAP administrative match from 50 to 25 percent, requiring counties to substantially increase their contributions starting in FY 2027. This shift arrives at a difficult moment, as counties confront outdated technology systems, staffing shortages and heightened demands to improve program administration and reduce payment errors. In Franklin County, Ohio, the shift would require approximately $7.5 million in additional local spending annually to maintain current service levels. Counties in North Carolina, which are responsible for the entire administrative match, face an estimated cost of $65 million annually.[1] Furthermore, according to the *NACo Big Shift Report,* county budgets are already strained by broader economic conditions, including declining GDP, making it harder to absorb additional federal cost.[2]

Counties' ability to generate revenue is also limited. Most rely on property taxes, while Ohio counties rely more heavily on sales taxes, with taxing authority granted by the state. To offset the SNAP administrative cost shift, many counties anticipate raising property taxes. The Association of Minnesota Counties estimates an average statewide increase of 3.25 percent, depending on the number of SNAP participants in each county. For instance, Blue Earth County projects an increase of roughly 2.9 percent, while Ramsey County could face a hike of 4.8 percent.[3] With the significant shift to the SNAP administrative cost share requirement, counties urge Congress to delay implementation to provide counties and states sufficient time to modernize technology and implement targeted cost-saving measures.

<u>Counties rely on flexible tools, such as Broad-Based Categorical Eligibility (BBCE) and the Standard Utility Allowance (SUA), to efficiently manage caseloads.</u>

[1] North Carolina Department of Health and Human Services
[2] The Big Shift: An Analysis of the Local Cost of Federal Cuts
[3] Federal changes to shift SNAP costs to Minnesota counties, which could mean property tax hikes

As administrators, counties are committed to ensuring SNAP is administered effectively, so that the program serves those who need it most and maintains the trust of taxpayers. To efficiently manage SNAP eligibility and enrollment, counties need adequate resources and flexible tools, such as Broad-Based Categorical Eligibility (BBCE) and the Standard Utility Allowance (SUA). As new federal requirements shift a greater share of SNAP benefit and administrative costs to states and counties, the demand for accurate, timely and additional reporting will grow. Counties will be expected to process more complex determinations, track expanded work requirements and ensure compliance across larger caseloads. Access to BBCE and SUA is essential to streamline workflows, reduce duplicative paperwork and let staff focus on supporting participants.

Under SNAP, Able-Bodied Adults Without Dependents (ABAWDs) must work at least 80 hours per month or participate in qualifying education or training; those who do not are limited to three months of SNAP benefits in a three-year period. Counties determine compliance and must monitor it. OBBBA expanded the ABAWD definition to include additional populations, including individuals ages 55–64, those with dependents of 14 years of age and older, certain veterans, people experiencing homelessness and former foster youth, substantially increasing counties' administrative responsibilities. In my home state of Ohio, we anticipate 17,000 veterans, former foster youth, and people experiencing homelessness will now be subject to work requirements. In Minnesota, the state anticipates roughly 9,000 additional individuals from the same population will now be subject to work requirements.[4] These changes arrive amid local government staffing shortages and long training curves; staff often require a year or more to become fully proficient in eligibility, tracking, and compliance. Targeted federal and state support for hiring and training would support counties successfully implement the expanded ABAWD requirements without disrupting current service delivery. Additionally, technical assistance and federal support to automate banked-month tracking would help ensure that staff time is directed to substantive casework rather than manual counting.

To ensure counties can effectively monitor these new requirements, we will continue to utilize current federal tools. For example, SUA reduces error risk and documentation burden by substituting a standard deduction for fluctuating utility bills. Nine of the ten county-administered states make SUAs mandatory. However, under OBBBA, Low-Income Home Energy Assistance Program (LIHEAP) payments can no longer be used to qualify for the SUA in households without an elderly or disabled member. As more households must submit and update actual utility costs, counties anticipate increased administrative touchpoints and a likely rise in documentation errors.

In addition to SUA, BBCE – utilized by all 10 county-administered states – is a proven efficiency

[4] Federal SNAP provisions in the 2025 reconciliation bill: Impacts on Minnesota

tool when it comes to streamlining applications. By granting categorical eligibility for individuals that participate in the Temporary Assistance for Needy Families (TANF) or other state Maintenance of Effort–funded programs, BBCE reduces duplicative financial checks and eases access for applicants, particularly working families, older adults and individuals with disabilities. In a 2019 analysis by the U.S. Department of Agriculture (USDA), the agency estimated that eliminating categorical eligibility would add approximately 43.75 minutes per initial application and 26.25 minutes per recertification – time that would otherwise be used enhancing the program's effectiveness.

Work requirement waivers and SNAP E&T serve as effective means for counties to respond to local community needs and labor market conditions.

States receive a limited pool of discretionary exemptions that extend SNAP eligibility for individual ABAWDs one month at a time. Counties in Colorado, Minnesota, New Jersey, North Dakota, North Carolina, Ohio, Virginia and Wisconsin administer these exemptions. Currently, California and New York are the only two county-administered states that have statewide time-limit waivers and have not used discretionary exemptions in recent years. Counties rely on discretionary exemptions to mitigate churn for individuals facing temporary barriers (e.g., homelessness or irregular hours). In one large metro county in Minnesota, close to 9,000 residents experiencing homelessness were able to access SNAP benefits due to the use of ABAWD discretionary exemptions in 2024. The scale of this challenge is also reflected nationally: on a single night in 2024, the U.S. Department of Housing and Urban Development reported 771,480 people experiencing homelessness (the highest number ever recorded), and in 2025, Treasury Secretary Scott Bessent signaled plans to declare a national housing crisis.[5] Given these conditions, and the effectiveness of discretionary exemptions in stabilizing access to food assistance, counties support preserving this critical policy tool.

Prior to OBBBA, states could obtain ABAWD time limit waivers for areas with unemployment above 10 percent or with insufficient jobs. In the third quarter of FY 2025, eight of the ten county-administered states (all but Ohio and North Carolina) used time limit waivers. Under OBBBA's narrower standard, which limits waivers strictly to areas with unemployment above 10 percent, only three counties (Imperial County, Calif., Colusa County, Calif. and Tulare County, Calif.), in the ten county administered states will qualify, according to 2024 unemployment rates from the U.S. Bureau of Labor Statistics (BLS).[6] This new standard will substantially expand the number of individuals subject to time limits and increase county monitoring workloads even when local labor conditions warrant flexibility. In the most recent BLS data, the national unemployment rate hit a near four-year high at 4.3 percent, while the national underemployment rate, which

[5] Trump administration to target housing costs: Bessent
[6] Local Area Unemployment Statistics, U.S. Bureau of Labor Statistics

includes discouraged and involuntary part-time workers, rose to approximately 8.1 percent.[7] These figures demonstrate the fragility of the labor market and the need for flexible measures when considering the use of time limit waivers. Counties respectfully request that Congress authorize the use of multiple credible indicators of insufficient jobs (e.g., job-to-applicant ratios, sustained underemployment, or other labor metrics) for time limit waivers.

SNAP Employment and Training (E&T) is a critical program that provides eligible SNAP participants with training and education services to support self-sufficiency. All states must have an E&T program available, and in county-administered states, counties typically deliver or coordinate services with community colleges, workforce boards and nonprofit providers. In nine of these states, E&T participation is voluntary, while New York requires participation for some household members and offers voluntary participation to others. In Franklin County, we've partnered with a local nonprofit, Godman Guild, to administer E&T and provide participants with individualized career assessments, job readiness training, resources to address employment barriers, and opportunities for occupational skills training–all with a focus on meeting local employer needs. To align E&T capacity with expanded ABAWD populations and local labor markets, Congress and FNS should simplify reimbursement and reporting requirements and empower counties to build new partnerships in low-income communities.

Conclusion

Chair Finstad, Ranking Member Hayes and members of the Subcommittee, thank you again for the opportunity to share the county perspective on SNAP administration and state options. Counties are on the front lines of delivering essential nutrition services to millions of residents and remain deeply committed to ensuring program integrity while supporting the needs of vulnerable families. We look forward to working with Congress, USDA and our state partners to strengthen intergovernmental collaboration, streamline program administration and ensure that SNAP continues to serve as a critical lifeline for individuals and families in every community across the nation.

[7] Economic News Release, U.S. Bureau of Labor Statistics