Safe at home • Supporting the people who support the families • Opportunities for success

MEMORANDUM

Date: September 9, 2025

To: Chairman Brad Finstad and Vice Chairwoman Monica De La Cruz

Subcommittee on Nutrition and Foreign Agriculture

From: Korin A. Schmidt, Director

Subject: Written Testimony - Exploring State Options for SNAP

Ref.: KAS-2025-073

Good morning, Mr. Chairman, Ranking Member Hayes, and distinguished Committee Members. My name is Korin Schmidt and I am the Director of the Wyoming Department of Family Services (DFS). On behalf of Governor Mark Gordon and our agency's staff, I thank you for the opportunity to speak to you. Addressing hunger is a priority for our state, Governor, and in particular, First Lady Jennie Gordon. She is a tremendous advocate and has built a strong framework for community support and solutions to feed children and families.

My comments speak solely to Wyoming's approach to administering our Supplemental Nutrition Assistance Program. While we believe there is always an opportunity to learn from others, I have full respect for my colleagues in other states and jurisdictions - who, like myself, administer public programs while recognizing the cultural and political values of their constituency.

The Wyoming Department of Family Services (DFS) is the state's human services agency that provides temporary support to our most vulnerable populations. Our portfolio of responsibilities include child and adult protective services, juvenile justice, food security, weatherization and utility support, childcare assistance, child support services, cash assistance, and of course, SNAP.

Wyoming DFS utilizes a framework called WY Home Matters that bundles government services to holistically support families - rather than trying to tackle individual problems with individual solutions. SNAP has become a vital part of this framework - if anyone in the home is hungry, the foundation for a healthy home life is threatened. While my comments are largely about Wyoming's SNAP-specific administration, please bear in mind that we use SNAP as one component in the larger scheme of this framework.

Wyoming's population is less than 600,000 people and is mostly considered frontier, with the majority of counties having fewer than six people per square mile. This translates into large portions of our population living in a low-access area. For reference, this often means traveling 10 miles or more to a grocery store. In addition, Wyoming's aging population is growing at the fastest rate in the US. According to America's Health Ranking's 2024 report, Wyoming's older adults with disabilities, older adult renters, and older adults living near or below the poverty level are disproportionately affected by food insecurity. Further yet, while our younger population is rapidly declining, Feeding America reported in 2024 that one in five Wyoming children face hunger.

In our state, SNAP is an integral part of addressing hunger, keeping families together, and elderly people in their homes. For a frontier state with low food access, it is an effective and proven intervention to address hunger. Last state fiscal year (2025), a monthly average of 13,405 households making less than \$3380 a month for a family of four received a typical food benefit of \$386. Those households were made up of 28,364 individuals of which 44% were children, 35% were adults, 13% were 60+ years, and 8% were able bodied adults without dependents, otherwise known as "ABAWDS." Those households also spent approximately \$62 million in SNAP benefits on food.

Like many other small, politically conservative states, we have a limited staff responsible for program administration, eligibility determination, and case management. Our SNAP team in the field consists of 92 workers in 28 offices across the state. They directly work with new and ongoing clients to determine eligibility and benefit amounts. We have three program managers who are responsible for the administration and management of SNAP, SNAP Education, SNAP Employment and Training, the Commodity Supplemental Food Program (CSFP), and The Emergency Food Assistance Program (TEFAP). The 12 staff in our quality control and fraud protection units are extremely important partners and play a large role in our program's success. Their work is essential to maintain the integrity and credibility of the SNAP program, and ongoing support is strengthened by public trust.

Given our limited staffing and Wyoming's focus on cost-conscious governance, the payment error rate has been a primary indicator of program performance for decades. Wyoming has maintained a payment error rate below 6% since 2015 [for the years the error rates were collected]. The error rate is highly susceptible to even slight changes in policy and casework any deviation requires thoughtful and thorough consideration. We manage what is an intentionally basic program to ensure we are not operating beyond our staff's ability. Constrained staffing and resources make us risk-averse, so we approach waiver and policy options with caution. We carefully vet opportunities through small pilot programs, research, and extensive conversations with other states that have implemented similar changes. Because of DFS's limited resources (staff and money), we look to the lessons learned by other states to assess the potential benefits and the risks to program accuracy and integrity. Based on these findings, we refine our eligibility processes to balance efficiency, accountability, and program integrity.

We also attribute our successes to the strong partnership between our eligibility field staff and the program team. The positive relationship between the caseworkers and the program managers allows for frequent and planned communication that promotes honesty and hard conversations. Field and program leadership meet monthly to review error rates and brainstorm adjustment strategies. They understand the intertwined nature of their work and that ultimately their own success relies on the success of others. All staff meet once every six weeks for training opportunities, policy refreshers, and rapport-building.

A focus on quality control and fraud detection is critical to maintaining ongoing public support for the SNAP program. We implemented Front End Eligibility (FEE), which is a fraud detection tool used at the time of client application. FEE allows us to investigate potential fraud before an application is approved and a benefit is issued. Checking for fraud at the beginning of the process avoids the "pay-and-chase" model, where benefits were issued and more time and money in collection efforts. We estimate avoiding \$975,955 in fraudulent benefit issuance from December 2022 through March 2025.

Wyoming's SNAP Education and Training (E&T) program is another great example of leveraging federal resources to provide SNAP recipients with opportunities to become self-reliant and decrease their dependence on temporary assistance. Climb Wyoming, recognized as a nationally leading job training program, helps single mothers to secure employment that provides financial stability to transition off public assistance. Dads Making a Difference takes a similar approach, focusing on building fathers' capacity to maintain employment and strengthen parenting skills. Both programs receive SNAP E&T to serve SNAP clients. Starting October 1, we are adding employment services tailored specifically for ABAWDs and expect to see positive outcomes from this service as well.

As states are expected to increase their financial contribution to the program, please consider expanding the State's ability to tailor policy and program changes to meet our needs. The current scope and regulatory structure of waivers and options do not give us the full ability to make sound economic and programmatic decisions on behalf of our clients and our residents. For example, Wyoming is facing numerous challenges with a rapidly growing elderly population that will not be able to generate income through work. Without basic necessities like food, many of these folks who would rather grow old at home are at increased risk of needing more expensive placement services, more than likely at a higher cost to taxpayers. In this scenario, Wyoming's low-income elderly would benefit from a waiver that removes the asset limit for households receiving a Social Security benefit under a designated threshold.

As mentioned, whenever policy changes occur, whether through a federal mandate or a state-elected waiver/option, error rates often rise temporarily as eligibility workers adjust to new procedures. We believe a "hold harmless period" that begins after guidance is issued would be a helpful tool to allow error rates to stabilize and ensure the change is implemented appropriately and effectively.

Last, we would welcome a dialogue regarding meaningful outcomes that more accurately define a successful program. Error rates are sound indicators of regulatory and programmatic compliance; however, it's also possible to define success as a family that, as a result of their temporary participation in SNAP, was able to achieve self-sufficiency through strong job training or education programs and consequently avoided future involvement with other entitlement programs. Moreover, success is an elderly person who was able to live at home longer because they were able to access the necessary foods to keep them healthy. Or that a family avoided the desperation of a food crisis that would have put them at higher risk of involvement with the child welfare system.

Thank you again for the invitation and the opportunity to showcase Wyoming's hard work and successes, much of which is due to the dedication of our DFS family.

cc: Mr. Drew Perkins, Chief of Staff to Governor Mark Gordon Mr. Curtis Biggs, Senior Health and Human Services Policy Advisor, Office of the Governor