
CONGRESSIONAL TESTIMONY

Food Insecurity, SNAP Program Integrity, and the Need for Evidence-Based Oversight

**Testimony before the
Subcommittee on Delivering on Government Efficiency**

U.S. House of Representatives

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June 25, 2026

Chairman, Ranking Member, and Members of the Committee:

Thank you for the opportunity to provide testimony on efforts to ensure integrity in the Supplemental Nutrition Assistance Program (SNAP). Protecting taxpayer dollars is an important responsibility. Equally important is ensuring that eligible Americans can access the food assistance Congress intended for them. These goals are not mutually exclusive. In fact, SNAP's history demonstrates that strong program integrity and broad access can and should coexist.

As Congress evaluates SNAP integrity, it is essential to distinguish between fraud, administrative errors, payment accuracy measures, and benefit theft. These concepts are often conflated in public discussions, leading to policy solutions that may increase administrative burdens and cut food access for eligible Americans without meaningfully reducing fraud. Effective oversight requires a clear understanding of what SNAP measures, where actual fraud occurs, and how policies affect both taxpayers and families.

SNAP's Role in Addressing Food Insecurity

Food insecurity, the inability to afford enough food for an active, healthy life, is a deepening crisis in the U.S., affecting tens of millions of people, especially those in low-income

households.¹² Food insecurity is not simply about missed meals. Research consistently demonstrates that it is associated with poor dietary quality and a higher risk of diet-related diseases, including cardiovascular disease, diabetes, and certain cancers.³ Food insecurity also limits individuals' and families' ability to follow healthy dietary patterns, with implications for human development and school experiences.⁴⁵

In 2024, approximately 47.9 million people in the U.S. lived in food-insecure households, including 14.1 million children.⁶ Food insecurity also imposes avoidable health care costs at both societal and individual levels.⁷

The economic consequences are equally significant. Food insecurity contributes to higher health care utilization, increased hospitalizations, poorer disease management, and greater public expenditures.⁸⁹ Researchers estimate that food insecurity generates approximately \$179 billion annually in excess health care costs nationwide, and the cost related to food insecurity in children younger than 4 years is \$1.2 billion.¹⁰ These costs are ultimately borne by taxpayers, employers, health systems, and families.

Food insecurity is inextricably linked to poverty. In 2024, nearly 40 percent of households living below the federal poverty line experienced food insecurity.¹¹ Rates were substantially

¹ USDA ERS — Food security in the U.S. (2018). Usda.gov. <https://www.ers.usda.gov/topics/food-nutrition-assistance/food-security-in-the-us>

² Gunderson, C., & Ziliak, J. P. (2015). Food insecurity and health outcomes. *Health Affairs*, 34(11). <https://doi.org/10.1377/hlthaff.2015.0645>

³ Young, A. O., Brown, A., Collins, T. A., & Glanz, K. (2023). Food insecurity, Neighborhood Food environment, and Health disparities: State of the science, Research Gaps and Opportunities. *The American Journal of Clinical Nutrition*, 119(3), 850–861. <https://doi.org/10.1016/j.ajcnut.2023.12.019>

⁴ USDA. (2020). Dietary Guidelines for Americans 2020-2025. In Dietary Guidelines for Americans. USDA. https://www.dietaryguide.lines.gov/sites/default/files/2021-03/Dietary_Guidelines_for_Americans-2020-2025.pdf

⁵ U.S. Department of Health and Human Services. (2021). Reduce household food insecurity and hunger — NWS01 - Healthy People 2030 Health.gov. <https://health.gov/healthypeople/objectives-and-data/browse-objectives/nutrition-and-healthy-eating/reduce-household-food-insecurity-and-hunger-nws-01>

⁶ Rabbitt, M., Reed-Jones, M., Hales, L., Suttles, S., & Burke, M. (2025). *Household Food Security in the United States in 2024*. <https://www.ers.usda.gov/media/9161/err-358.pdf?v=96900>

⁷ Dean, E. B., French, M. T., & Mortensen, K. (2020). Food insecurity, health care utilization, and health care expenditures. *Health Services Research*, 55(2). <https://doi.org/10.1111/1475-6773.13283>

⁸ Caswell, M. (2023, February 23). Food insecurity is caused by and leads to higher health care cost. PBGH. <https://www.pbgh.org/food-insecurity-cause-and-effect-of-higher-health-care-costs/>

⁹ Peltz, A., & Garg, A. (2019). Food insecurity and health care use. *Pediatrics*, 144(4). <https://doi.org/10.1542/peds.2019-0347>

¹⁰ Children's HealthWatch. (2025, June 26). *The Health and Educational Costs Related to Food Insecurity - Children's HealthWatch*. Children's HealthWatch. <https://childrenshealthwatch.org/the-health-and-educational-costs-related-to-food-insecurity/>

¹¹ USDA ERS - Food security and nutrition assistance. (n.d.). www.ers.usda.gov. <https://www.ers.usda.gov/data-products/ag-and-food-statistics-charting-the-essentials/food-security-and-nutrition-assistance>

higher among Black (18.4 percent), Hispanic (15 percent), and American Indian and Alaska Native populations (19.3 percent) than White households (7.6 percent).¹²

At the same time, families continue to face elevated costs for food, housing, utilities, transportation, and child care.¹³¹⁴ Utility debt remains high nationwide, and many low-income households have little or no savings to absorb economic shocks.¹⁵ Although unemployment remains relatively low nationally, labor market growth has slowed, and many workers still face unstable schedules, fluctuating earnings, and insufficient wages.¹⁶¹⁷

SNAP's importance is particularly evident in rural America, where economic hardship and food insecurity remain persistent challenges.¹⁸ While approximately 11.1 percent of the U.S. population lives in poverty, that figure rises to 15.3 percent in rural communities. Food insecurity follows a similar pattern.¹⁹ Nationally, 12.2 percent of households experience food insecurity, compared to 15.4 percent of rural households.²⁰ As a result, SNAP plays an especially important role in rural economies and communities. Approximately one in seven rural households participates in SNAP, compared to roughly one in eight households in metropolitan areas.²¹ For many rural families, SNAP helps bridge gaps created by lower wages, limited employment opportunities, transportation challenges, and reduced access to food retailers, transportation, and health care services.

¹² Bureau, U. C. (2025, September 9). *Poverty in the United States: 2024*. Census.gov. <https://www.census.gov/library/publications/2025/demo/p60-287.html>

¹³ Murphy, J., & Wu, J. (2026, February 8). *Grocery price tracker: Inflation trends for eggs, bread and more during the Trump administration*. NBC News. <https://www.nbcnews.com/data-graphics/grocery-price-tracker-inflation-trends-eggs-bread-trump-administration-rcna257424>

¹⁴ *Summer Residential Cooling Outlook: Residential Electric Utility Expenditures Projected to Increase by 8.5% this Summer*. (n.d.). <https://neada.org/wp-content/uploads/2026/04/NEADA-CEPC-Summer-Cooling-4-24-26.pdf>

¹⁵ *National Energy Assistance Directors Association Putting Millions of Families at Risk of Falling Behind on their Bills Electric and Natural Gas Prices Drive Sharp Increase in Winter Heating Bills*. (n.d.). https://neada.org/wp-content/uploads/2026/02/NEADA-Winter-Heating-Update-2_12_26.pdf

¹⁶ *U.S. Labor Market: Low-Hire, Low-Fire Economy | U.S. Bank*. (2026, June 11). Usbank.com. <https://www.usbank.com/corporate-and-commercial-banking/insights/economy/macro/us-labor-market.html>

¹⁷ Board of Governors of the Federal Reserve System. *Report on the Economic Well-Being of U.S. Households in 2024 – May 2025: Employment and Gig Work*. Washington, DC: Board of Governors of the Federal Reserve System, 2025.

¹⁸ Plata-Nino, G. (2025g, August 26). *SNAP's Critical Role in Rural Communities — and the Consequences of Cuts - Food Research & Action Center*. Food Research & Action Center. <https://frac.org/blog/snaps-critical-role-in-rural-communities-and-the-consequences-of-cuts>

¹⁹ Id.

²⁰ Id.

²¹ Id.

Rural Need



FRAC
Food Research & Action Center

1. for poverty rural rate - Poverty estimates are based on the U.S. Census Bureau's decennial Census poverty measures and U.S. Census Bureau, Small Area Income and Poverty Estimates." Retrieved from for the national poverty rate-
2. for the food insecurity both national and rural - Rabbitt, M. P., Reed-Jones, M., Hales, L. J., & Burke, M. P. (2024). Household food security in the United States in 2023 (Report No. ERR-337). U.S. Department of Agriculture, Economic Research Service.
3. for SNAP utilization- in rural population it is R. FRAC, analysis of U.S. Census Bureau 2019-2023 American Community Survey (ACS) 5-Year Estimates using the ACS Public Use Microdata Sample
General utilization - Food Research & Action Center's (FRAC) analysis of U.S. Census Bureau 2019-2023 American Community Survey (ACS) 5-Year Estimates using the ACS Public Use Microdata Sample

Against this backdrop and considering recent research reporting that hunger levels exceed those seen during the pandemic, SNAP remains the nation's most effective anti-hunger program.²²

Who SNAP Serves and Impact

SNAP is the nation's primary defense against hunger and food insecurity, providing nutrition assistance to eligible individuals and households. SNAP served approximately 41.4 million people in fiscal year 2024.²³ Contrary to common misconceptions, SNAP primarily serves households facing significant economic hardship and households with characteristics that limit earning capacity.

US. Department of Agriculture data show that approximately 79 percent of SNAP households include a child, an older adult, or a person with a disability.²⁴ Nearly 95 percent of SNAP participants are U.S. citizens, 1 percent are refugees, and 4 percent are other eligible non-citizens, reflecting that SNAP use is driven by Americans.²⁵ Among program

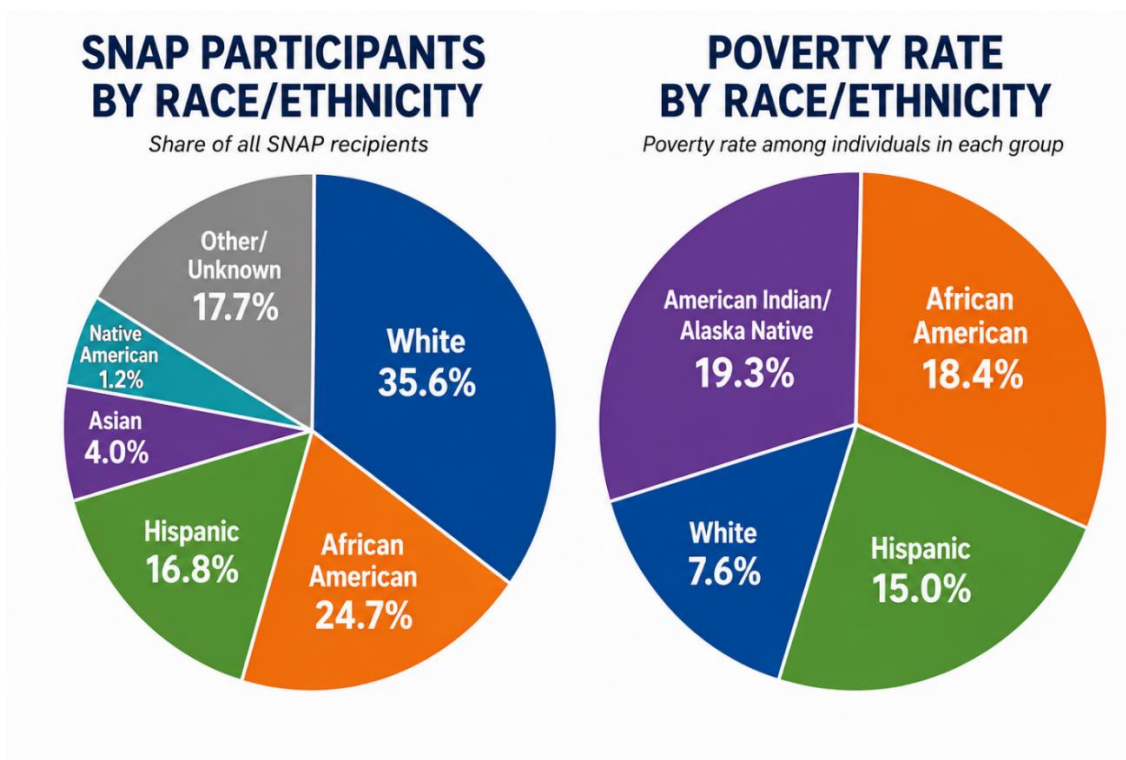
²² Kosar, G., Mehta, I., & van der Klaauw, W. (2026). Food Insecurity and Consumer Pessimism. *Liberty Street Economics* (Federal Reserve Bank of New York). <https://doi.org/10.59576/lse.20260527>

²³ Ward, B., & Monkovic, M. (2026). *Characteristics of Supplemental Nutrition Assistance Program Households: Fiscal Year 2024 Supplemental Nutrition Assistance Program Nutrition Assistance Program Report Series Evidence, Analysis, and Regulatory Affairs Office*. <https://fns-prod.azureedge.us/sites/default/files/resource-files/snap-fy2024characteristics-report.pdf>

²⁴ Ward, B., & Monkovic, M. (2026). *Characteristics of Supplemental Nutrition Assistance Program Households: Fiscal Year 2024 Supplemental Nutrition Assistance Program Nutrition Assistance Program Report Series Evidence, Analysis, and Regulatory Affairs Office*. <https://fns-prod.azureedge.us/sites/default/files/resource-files/snap-fy2024characteristics-report.pdf>

²⁵ Id.

participants, White individuals accounted for the largest share, representing more than 35 percent of all recipients. African Americans comprised nearly 25 percent, Hispanics nearly 17 percent, Asians 4 percent, and Native Americans just over 1 percent.²⁶



SNAP households have extremely limited financial resources. In fiscal year 2024, the average SNAP household reported gross monthly income of approximately \$1,117 and net monthly income of only \$551.²⁷ The average monthly SNAP benefit was approximately \$341 per household. Most participating households received less than the maximum benefit amount.²⁸

SNAP also serves working households.²⁹ Many participants are employed in low-wage industries with variable schedules and unstable employment.^{30,31} Others are temporarily unemployed due to layoffs, illness, caregiving responsibilities, or local economic

²⁶ Id.

²⁷ Ward, B., & Monkovic, M. (2026). *Characteristics of Supplemental Nutrition Assistance Program Households: Fiscal Year 2024 Supplemental Nutrition Assistance Program Nutrition Assistance Program Report Series Evidence, Analysis, and Regulatory Affairs Office*. <https://fns-prod.azureedge.us/sites/default/files/resource-files/snap-fy2024characteristics-report.pdf>

²⁸ Id.

²⁹ Id.

³⁰ Id.

³¹ Brown Barnes, C. (2021, February 25). *Low-Income Workers: Millions of Full-Time Workers in the Private Sector Rely on Federal Health Care and Food Assistance Programs* | U.S. GAO. [www.gao.gov](https://www.gao.gov/products/gao-21-410t). <https://www.gao.gov/products/gao-21-410t>

conditions.³²³³ Research consistently shows that many SNAP participants use the program temporarily during periods of economic hardship and leave it when their circumstances improve.³⁴³⁵

SNAP's impact extends beyond reducing hunger. When SNAP benefits are counted as income, about 16 percent of participating households move above the poverty line, and about 10 percent of the lowest-income households move out of deep poverty.³⁶

SNAP supports individuals across all developmental and life stages, positively impacting children, adults, and caregivers alike. For families with young children, SNAP increases the likelihood of affording enough food by 22 percent and reduces the chances of cutting children's meal sizes by 33 percent compared to income-eligible non-participating families.³⁷ Children in SNAP households exhibit better health, growth, and emotional and academic outcomes than their peers in non-participating income-eligible households.³⁸ For adults, SNAP participation is associated with improved mental health and a reduced risk of obesity, diabetes, and hypertension, particularly for those who participated during early childhood.³⁹ Additionally, mothers who participate in SNAP during pregnancy are less likely to have low-birth-weight babies, thereby avoiding various adverse health outcomes.⁴⁰

³² Leftin, J., Wemmerus, N., Mabli, J., Godfrey, T., Tordella, S. (December 2014). Dynamics of Supplemental Nutrition Assistance Program participation from 2008 to 2012. <https://fns-prod.azureedge.net/sites/default/files/ops/Dynamics2008-2012.pdf>

³³ *Beyond hunger: The role of SNAP in alleviating financial strain for low-income households*. (2024, June 20). Brookings. <https://www.brookings.edu/articles/beyond-hunger-the-role-of-snap-in-alleviating-financial-strain-for-low-income-households/>

³⁴ Mabli, J., Godfrey, T., Wemmerus, N., Leftin, J., & Tordella, S. Determinants of Supplemental Nutrition Assistance Program participation from 2008 to 2012. <https://fns-prod.azureedge.net/sites/default/files/ops/Determinants2008-2012.pdf>

³⁵ Current Perspectives on SNAP Participation. (n.d.). <https://fns-prod.azureedge.net/sites/default/files/ops/Determinants2008-2012.pdf>

³⁶ Id.

³⁷ Cuba, S. A. E. de, Bovell-Ammon, A. R., Cook, J. T., Coleman, S. M., Black, M. M., Chilton, M. M., Casey, P. H., Cutts, D. B., Heeren, T. C., Sandel, M. T., Sheward, R., & Frank, D. A. (2019). SNAP. Young children's health, and family food security and healthcare access. *American Journal of Preventive Medicine*, 57(4), 525–532. <https://doi.org/10.1016/j.amepre.2019.04.027>

³⁸ Children's HealthWatch (2012, February). The SNAP vaccine: Boosting children's health — Children's HealthWatch. Children's HealthWatch. <https://childrenshealthwatch.org/the-snap-vaccine-boosting-childrens-health/>

³⁹ Oddo, V. M., & Mabli, J. (2015). Association of participation in the Supplemental Nutrition Assistance Program and psychological distress. *American Journal of Public Health*, 105(6), e30–e35. <https://doi.org/10.2105/ajph.2014.302480>

⁴⁰ Almond, D., Hoynes, H. W., & Schanzenbach, D. W. (2011). Inside the war on poverty: The impact of food stamps on birth outcomes. *Review of Economics and Statistics*, 93(2), 387–403. https://doi.org/10.1162/rest_a_00089

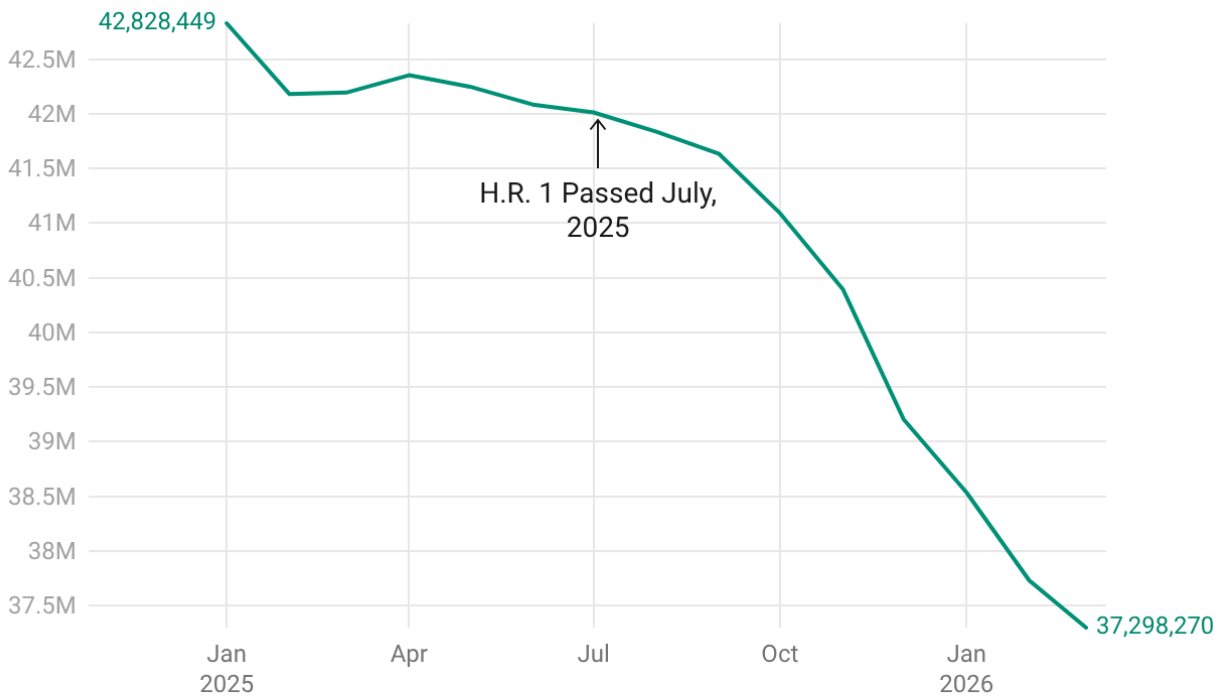
When SNAP benefits are reduced or terminated, families face significantly heightened risks of food insecurity.⁴¹

The Current Environment: Rising Need and Declining Participation

This context is critical because recent trends in SNAP participation should concern policymakers.

Since the enactment of the One Big Beautiful Bill (OBBBA/H.R. 1) in July 2025, more than 4 million people have lost SNAP benefits. While multiple provisions contributed to these declines, including expanded work requirements and procedural changes, the magnitude of participation losses raises serious questions about access.

SNAP Decline Since July 2025: 4.7 million people have lost access



January and February 2026 data are preliminary and may be revised in future months.

Chart: FRAC • Source: USDA • Created with Datawrapper

Importantly, these declines are occurring at a time when food insecurity remains elevated, and families continue to struggle with the cost of basic necessities.

⁴¹ Ettinger de Cuba, S., Chilton, M., Bovell-Ammon, A., Knowles, M., Coleman, S. M., Black, M. M., Cook, J. T., Cutts, D. B., Casey, P. H., Heeren, T. C., & Frank, D. A. (2019). Loss Of SNAP is associated with food insecurity and poor health in working families with young children. *Health Affairs*, 38(5), 765–773. <https://doi.org/10.1377/hlthaff.2018.05265>

Historically, Congress has judged SNAP's success not only by its payment accuracy but also by its ability to reach eligible households. A reduction in participation is not inherently evidence of improved program integrity. Participation declines can also indicate that eligible households are encountering barriers during application, recertification, or reporting processes.

The consequences of these losses extend beyond individual households. Reduced SNAP participation shifts demand onto food banks, charitable organizations, school meal programs, hospitals, and local governments.⁴² Declining SNAP participation also has consequences beyond the SNAP program itself. Children in households receiving SNAP are automatically directly certified for free school meals, eliminating paperwork barriers and ensuring timely access to school nutrition programs.⁴³ Direct certification rates are also the primary factor used to determine whether schools can participate in the Community Eligibility Provision (CEP), which allows high-poverty schools to offer free breakfast and lunch to all students without requiring individual household applications.⁴⁴

As SNAP participation declines, fewer children are directly certified, which can lower schools' identified student percentages and jeopardize CEP eligibility.⁴⁵ This creates a ripple effect that extends beyond SNAP, potentially limiting thousands of children's access to school meals. CEP helps ensure that every student in high-need schools can benefit from nutritious school meals, reduces administrative burdens on schools and families, increases participation in school meal programs, and supports student health, attendance, and academic performance.⁴⁶ Policies that unnecessarily reduce SNAP participation do not simply affect household food purchasing power; they can also weaken children's access to school meals and undermine one of the nation's most effective strategies for reducing childhood hunger. They also reduce spending at local grocery stores and other food retailers, particularly in rural and economically distressed communities.^{47,48}

SNAP Has One of the Most Rigorous Integrity Systems in the Federal Government

⁴² Smith, T. (2025, November 20). *Food banks, already strained, brace for prolonged demand*. NPR. <https://www.npr.org/2025/11/19/nx-s1-5607236/food-banks-brace-for-prolonged-demand>

⁴³ *Cuts to SNAP Threaten the Child Nutrition Programs*. (n.d.). <https://frac.org/wp-content/uploads/Cuts-SNAP-Threaten-Child-Nutrition-Programs.pdf>

⁴⁴ Id.

⁴⁵ Id.

⁴⁶ Id.

⁴⁷ Plata-Nino, G. (2025e, August 26). *SNAP's Critical Role in Rural Communities — and the Consequences of Cuts* - Food Research & Action Center. Food Research & Action Center. <https://frac.org/blog/snaps-critical-role-in-rural-communities-and-the-consequences-of-cuts>

⁴⁸ Plata-Nino, G. (2025d, April 22). *Part 3-The Real Cost of Cutting SNAP: Jobs Lost, Stores Closed, Communities Undermined* - Food Research & Action Center. Food Research & Action Center. <https://frac.org/blog/part-3-the-real-cost-of-cutting-snap-jobs-lost-stores-closed-communities-undermined>

SNAP already operates under one of the most comprehensive integrity systems in the federal government.⁴⁹ Few federal programs subject both applicants and administrators to the same level of scrutiny.

Before receiving benefits, households must complete detailed applications that often exceed twenty pages and may be substantially longer depending on state requirements.⁵⁰ Applicants must disclose extensive information about household composition, income sources, expenses, employment, citizenship or immigration status, residency, and other eligibility factors.⁵¹

After submitting an application, households must participate in an eligibility interview with a trained eligibility worker.⁵² During the interview, applicants must explain their circumstances, clarify any inconsistencies, and answer questions about their eligibility. States then require documentation to verify the information provided.⁵³ Depending on the household's circumstances, this may include wage records, employer statements, rent receipts, utility bills, immigration documents, disability determinations, child support records, or other forms of verification.

Eligibility workers do not accept this information at face value. State agencies routinely verify information using federal and state databases, including wage records, unemployment insurance systems, Social Security Administration data, immigration databases, and other electronic verification systems. Applicants must meet numerous federal eligibility requirements before benefits are approved.

The integrity process continues long after initial certification.⁵⁴ Most SNAP households must complete interim reporting requirements, typically around the six-month mark, and recertify at regular intervals, often every six or twelve months.⁵⁵ During these reviews, households must again verify their circumstances, submit documentation, and, in many cases, complete another interview.⁵⁶ States also conduct ongoing data matches throughout the certification period to identify discrepancies or changes in circumstances.

⁴⁹ Food Nutrition Service. (2026). *SNAP Quality Control | Food and Nutrition Administration*. Azureedge.us. <https://fns-prod.azureedge.us/snap/qc>

⁵⁰ Code of Federal Regulations. (2026). *7 CFR 273.2 -- Office operations and application processing*. Ecf.gov. <https://www.ecfr.gov/current/title-7/subtitle-B/chapter-II/subchapter-C/part-273/subpart-A/section-273.2>

⁵¹ Id.

⁵² Id.

⁵³ Id.

⁵⁴ Code of Federal Regulations. (2026b). *7 CFR 273.14 -- Recertification*. Ecf.gov. <https://www.ecfr.gov/current/title-7/section-273.14>

⁵⁵ Id.

⁵⁶ Id.

Beyond these front-end controls, SNAP maintains one of the most sophisticated quality-control systems in the federal government. Each year, states conduct detailed reviews of approximately 50,000 randomly selected SNAP cases nationwide.⁵⁷ Independent Quality Control reviewers reexamine every aspect of a household's eligibility and benefit determination.⁵⁸ These reviews often involve additional interviews, additional documentation requests, employer contacts, landlord contacts, and independent verification efforts that go well beyond routine case processing.

USDA then independently re-reviews a substantial subset of those cases to ensure consistency and accuracy.⁵⁹ The findings are used to calculate state and national payment error rates and to identify areas requiring corrective action.⁶⁰

Importantly, states already face significant accountability measures when error rates rise. States with elevated payment error rates must submit corrective action plans, undergo enhanced federal oversight, and may face fiscal sanctions.⁶¹⁶² As a result, SNAP has long operated with a culture that prioritizes payment accuracy and program integrity.

The question before Congress is not whether SNAP has accountability mechanisms. It does. The issue is policymakers are wrongly relying too heavily on a single performance measure while overlooking equally important measures of access and service delivery.

Despite these extensive safeguards, Congress recently enacted policies in H.R. 1 will make it more difficult for states to maintain the administrative capacity necessary to ensure both program accuracy and program integrity.

H.R. 1 Will Make Program Integrity More Difficult, Not Easier

As Congress considers ways to strengthen SNAP accountability, it is important to recognize that recent federal policy changes are moving states in the opposite direction.

For more than 50 years, SNAP operated as a federal-state partnership in which the federal government funded 50 percent of state administrative costs and states funded the remaining 50 percent. This structure recognized that effective program administration requires

⁵⁷ *SNAP: Four Steps to Quality Control | Food and Nutrition Administration*. (2026). Usda.gov. <https://www.fna.usda.gov/snap/infographic-four-steps-quality-control>

⁵⁸ Id.

⁵⁹ Id.

⁶⁰ *SNAP Quality Control | Food and Nutrition Administration*. (2026). Azureedge.us. <https://fns-prod.azureedge.us/snap/qc>

⁶¹ *SNAP Quality Control | Food and Nutrition Administration*. (2026). Azureedge.us. <https://fns-prod.azureedge.us/snap/qc>

⁶² Food Nutrition Service. (2024, July). *CORRECTIVE ACTION PLAN: Quality Control Review Reports*. <https://www.usda.gov/sites/default/files/guidance-documents/FNS.snap-capstaterequirements-july24.pdf>

substantial investments in eligibility systems, staff training, quality control reviews, fraud investigations, customer service operations, call centers, technology modernization, cybersecurity protections, and oversight activities.

H.R. 1 fundamentally altered that partnership. Beginning in fiscal year 2027, states will be responsible for 75 percent of SNAP administrative costs, while the federal government will provide only 25 percent.⁶³ At the same time, most states in fiscal year 2028 will, for the first time in SNAP's history, be required to contribute directly to SNAP food benefit costs based on their payment error rates.⁶⁴ States with payment error rates between 6 and 8 percent will pay 5 percent of benefit costs; states with rates between 8 and 10 percent will pay 10 percent of benefit costs; and states with rates above 10 percent will pay 15 percent of benefit costs.⁶⁵

These changes create a profound policy contradiction. Congress is asking states to improve payment accuracy, prevent fraud, strengthen oversight, modernize technology systems, address EBT theft, conduct more intensive quality-control activities, and implement major policy changes. Yet at the very moment these expectations are increasing, Congress is reducing the federal resources available to support those activities and shifting billions of dollars in new costs onto state governments.

Program integrity requires investment.⁶⁶⁶⁷ States reduce errors when they can hire and retain experienced eligibility workers. States reduce fraud when they can invest in investigative staff, modern data systems, and fraud detection tools. States improve payment accuracy when they can provide comprehensive staff training, modernize outdated eligibility systems, improve document processing, and conduct meaningful quality assurance reviews.⁶⁸

⁶³ Arrington, J. (2025, July 4). *Text - H.R. 1 - 119th Congress (2025-2026): One Big Beautiful Bill Act*. Congress.gov. <https://www.congress.gov/bill/119th-congress/house-bill/1/text>

⁶⁴ *Id.*

⁶⁵ The new law includes a carve-out that allows only certain states with very high error rates to delay cost-sharing for benefits, whereas other states that make good-faith investments to improve accuracy must pay sooner. ` States may delay cost-sharing until FY 2029 or FY 2030 if: » FY 2025 error rate $\times 1.5 \geq 20$ percent, or » FY 2026 error rate $\times 1.5 \geq 20$ percent. ` The delay may be used only once, based on data from either FY 2025 or FY 2026. Based on FY 2024 data, states likely to benefit include Alaska, Florida, Georgia, Maryland, Massachusetts, New Jersey, New Mexico, New York, Oregon, and the District of Columbia.

⁶⁶ *U.S. Digital Response SNAP Payment Accuracy Playbook | USDR Benefits Resource Hub*. (2026, May 19). Gitbook.io. <https://usdr.gitbook.io/benefits-resource-hub>

⁶⁷ Plata-Nino, G. (2026a). *Two-Fold Approach to Prevent Further Decline in SNAP Participation: Farm Bill Must Reverse SNAP Cuts, States Must Prioritize Timeliness, Reduce Administrative Burdens, to Improve Payment Accuracy*. - Food Research & Action Center. Food Research & Action Center. <https://frac.org/blog/two-fold-approach-to-prevent-further-decline-in-snap-participation-farm-bill-must-reverse-snap-cuts-states-must-prioritize-timeliness-reduce-administrative-burdens-to-improve-payment-accuracy>

⁶⁸ *U.S. Digital Response SNAP Payment Accuracy Playbook | USDR Benefits Resource Hub*. (2026, May 19). Gitbook.io. <https://usdr.gitbook.io/benefits-resource-hub>

The challenge is particularly acute because many states already face budget constraints.⁶⁹ States are managing rising Medicaid expenditures, disaster recovery costs, pension obligations, and slowing revenue growth.⁷⁰ As SNAP benefit cost-sharing becomes a line item in state budgets, state lawmakers will face difficult decisions about allocating limited resources.⁷¹

Unlike previous years, the cost of SNAP food benefits will now directly compete against education, public safety, transportation, public health, and other state priorities.⁷² This shift creates significant uncertainty for both state agencies and SNAP participants. States facing budget pressures may reduce investments in administrative systems, delay technology upgrades, limit staffing increases, or adopt policies designed primarily to reduce fiscal exposure rather than improve service delivery.

These incentives could have significant consequences for access to SNAP. States attempting to lower payment error rates may impose additional verification requirements, require more frequent reporting, increase procedural barriers, or adopt practices that discourage participation among eligible households. While such actions may reduce measured error rates, they can also increase wrongful denials, procedural terminations, and benefit losses among households that qualify for assistance.

The result could be a troubling cycle: fewer administrative resources leading to greater operational challenges, greater operational challenges leading to more barriers to participation, and more barriers to participation leading to higher levels of food insecurity among eligible households.

The most effective strategy for reducing errors, preventing fraud, and protecting taxpayer dollars is not to reduce administrative resources but to ensure that states have the capacity to administer the program accurately, efficiently, and securely while maintaining access for eligible households.

⁶⁹ Plata-Nino, G., Najera, T., & Moore, R. (2026, March 20). *State Fiscal Impacts of H.R. 1 and Considerations to Navigate Challenges - Food Research & Action Center*. Food Research & Action Center. <https://frac.org/blog/state-fiscal-impacts-of-h-r-1-and-considerations-to-navigate-challenges>

⁷⁰ Id.

⁷¹ Id.

⁷² Farmer, L. (2026, January 14). *As SNAP Changes Shift Food Assistance Costs, States Face New Choices*. Pew.org; The Pew Charitable Trusts. <https://www.pew.org/en/research-and-analysis/articles/2026/01/14/as-snap-changes-shift-food-assistance-costs-states-face-new-choices>

Understanding SNAP Errors vs. Fraud

Discussions about waste, fraud, and abuse frequently rely on SNAP payment error rates as evidence of widespread fraud. That interpretation is inaccurate.

Payment errors and fraud are fundamentally different. Fraud is an intentional act that violates federal and/or state laws and may result in criminal prosecution, disqualification, fines, and repayment obligations.⁷³ It requires deliberate actions intended to obtain benefits unlawfully. Errors, by contrast, are mistakes that may result in either overpayments or underpayments.⁷⁴ They do not necessarily indicate wrongdoing by either households or state agencies. This distinction is important because mixing the two can hide where real program vulnerabilities are. It can also unfairly burden eligible households without truly enhancing program integrity. Additionally, policies aimed at preventing fraud often differ significantly from those that focus on reducing errors.

SNAP payment errors result from the complexity of eligibility determination, changing household circumstances, administrative mistakes, documentation deficiencies, or procedural issues. SNAP eligibility is based on numerous factors that can change frequently, including household composition, earned income, self-employment income, shelter costs, utility expenses, disability status, and employment circumstances. A household's circumstances may change several times between the date of application and the date a Quality Control reviewer examines the case months later.

USDA's own data consistently demonstrate that most payment errors stem from household mistakes, agency mistakes, procedural deficiencies, or changes in circumstances. In fiscal year 2023, USDA reported that more than half of all SNAP overpayments were attributable to agency error rather than recipient actions.⁷⁵

Understanding this distinction is critical because effective solutions differ dramatically. Fraud requires investigative tools, law enforcement coordination, retailer oversight, and anti-theft protections. Errors are more effectively addressed through staff training, technology modernization, simplified policies, improved customer communication, and administrative investments. Treating every payment error as fraud not only misrepresents

⁷³ Aussenberg, R. (2025). *Supplemental Nutrition Assistance Program: Errors and Fraud*. Congressional Research Service. https://www.congress.gov/crs_external_products/IF/PDF/IF10860/IF10860.7.pdf

⁷⁴ Id.

⁷⁵ Food Nutrition Service. (2025). *Supplemental Nutrition Assistance Program (SNAP) Quality Control Annual Report Fiscal Year 2023*. <https://fns-prod.azureedge.us/sites/default/files/resource-files/snap-qc-annualreportfy23.pdf>

the data but also encourages policies that create additional barriers for eligible households while doing little to prevent intentional wrongdoing.

Examples of Fraud	Examples of Errors
Benefit theft through EBT skimming, cloning, phishing, and related scams	A household misunderstands reporting requirements.
Knowingly concealing income.	An eligibility worker enters information incorrectly.
Falsifying household composition.	A computer system calculates benefits incorrectly.
Selling SNAP benefits for cash.	Documentation is incomplete.
Creating fraudulent retailer transactions.	Income changes after application but before review.
Establishing fictitious cases.	Administrative procedures are not completed properly.

What Payment Error Rates Actually Measure

Under the Quality Control (QC) system, state agencies randomly select approved cases each month and conduct detailed reassessments of eligibility and benefit determinations.⁷⁶ QC reviewers hold deep technical knowledge of SNAP rules that affect case accuracy. They spend substantially more time per case than frontline eligibility workers and often rely on data sources not available during routine case processing. Through this process, they identify cases that should not have been accepted onto the SNAP caseload, cases that received a higher benefit than they should have, and cases that received a lower benefit than they should have. States correct all errors by adjusting household benefits (including reimbursing underpayments and claiming back overpayments) and closing cases as needed.

Next, USDA QC staff independently re-examine a subset of state-reviewed cases. USDA reviewers may revise state determinations if they identify uncorrected errors or determine that flagged payments were accurate. Based on these reviews, USDA calculates the same three error components that the states do—ineligible households accepted onto the caseload and issued benefits, overpayments to eligible households, and underpayments to eligible households—and calculates three numbers, an underpayment rate, an overpayment rate, and a combined total state error rate. These rates are expressed

⁷⁶ U.S. Department of Agriculture, Food and Nutrition Service. (2023, June 6). *SNAP: Four steps to quality control*. <https://www.fns.usda.gov/snap/infographic-four-steps-quality-control>

as the share of SNAP benefit dollars issued in error, not the share of cases. Findings from the sampled cases are extrapolated to the entire caseload.

For example, if a state issued \$10 million in benefits in a month, the QC review finds that it paid \$200,000 to ineligible households, overpaid eligible households by \$300,000, and underpaid other households by \$100,000. The state's payment error rate would be 6 percent, not 4 percent. The rate excludes benefits improperly denied altogether, even though such denials may reflect serious administrative failures.

Payment Error Rates over Time

Table 1: National SNAP Payment Error Rates 2003-2024

Year	Overpayment Rate	Underpayment Rate	Overall Payment Error Rate
2003	5.04	1.59	6.63
2004	4.48	1.41	5.88
2005	4.53	1.31	5.84
2006	4.82	1.17	5.99
2007	4.58	1.06	5.64
2008	4.01	1.00	5.01
2009	3.53	0.82	4.36
2010	3.05	0.75	3.81
2011	2.99	0.81	3.80
2012	2.77	0.65	3.42
2013	2.61	0.60	3.20
2014	2.96	0.69	3.66
2015	No data		
2016	No data		
2017	5.19	1.11	6.30
2018	5.59	1.22	6.80
2019	6.18	1.18	7.36
2020	No data		
2021	No data		
2022	9.84	1.70	11.54
2023	10.03	1.64	11.68
2024	9.26	1.67	10.93

The USDA provides SNAP payment error rates (PER) dating back to 2003 at both the national and state levels. The PER remained low until 2014, when data concerns arose in the QC process, prompting a suspension of error reporting while a comprehensive review of all state QC systems was undertaken. Data was published in 2017, 2018, and 2019, but QC reporting was again halted in 2020 and 2021 due to the significant challenges states faced in administering SNAP during the COVID-19 Public Health Emergency (PHE). During that period, USDA implemented many flexibilities for states, such as waiving eligibility interviews,

which reduced contact between SNAP staff and participants and affected the information collected during applications. Additionally, states faced large caseloads, resulting in caseworkers managing more cases than typical.

National SNAP Payment Error Rate 2003-2024

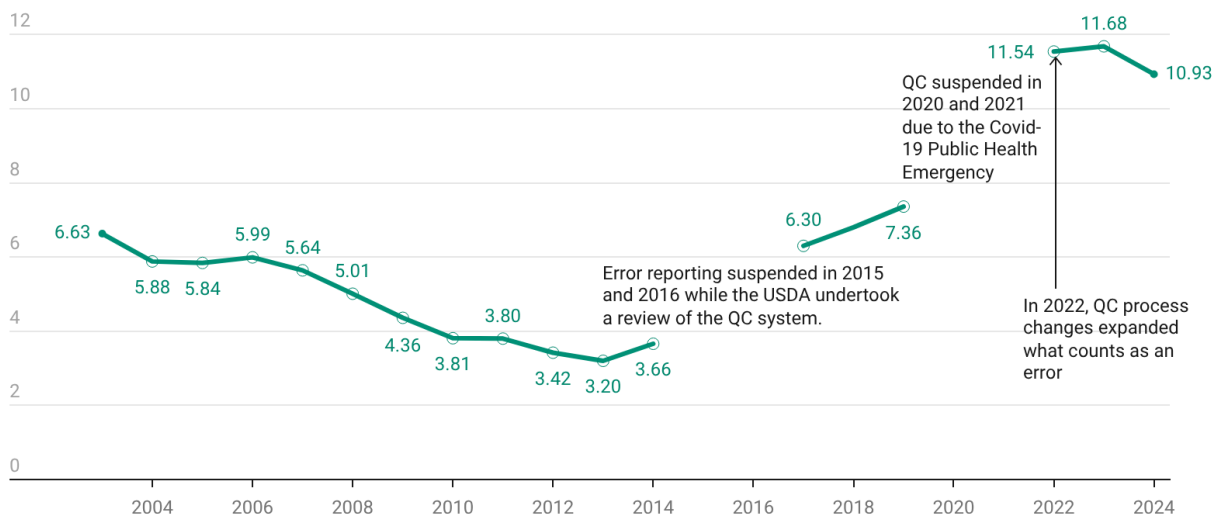


Chart: FRAC • Source: USDA • Created with Datawrapper

The end of the PHE left state SNAP agencies radically reshaped. Many agencies faced reduced staffing and a loss of institutional program knowledge. Economic conditions did not immediately return to normal, and COVID-era waivers and operational changes persisted for quite some time. All of these factors contributed to elevated error rates, but 2022 also saw a significant policy shift in what counted as an error. In the 2022 revision to the QC Handbook, USDA added language stating that a case missing a reporting form or with an incomplete form should be deemed ineligible immediately. Prior versions of the handbook allowed QC to take additional steps to verify that the SNAP determination was correct.

What the PER Does Not Measure

Although SNAP payment error rates are often treated as a proxy for overall program performance, they measure only payment accuracy within reviewed cases and do not capture several other important dimensions of program integrity and effectiveness.⁷⁷ Key limitations include:

- QC reviews include only participating SNAP households; the error rate completely excludes households that are improperly denied, even though such denials reflect serious administrative failures. If, for example, a state improperly denied the applications of 1,000 households who should have received an average of \$300 a month, that \$300,000 in unpaid benefits is not part of the error rate.⁷⁸

⁷⁷ U.S. Department of Agriculture, Food and Nutrition Service. (2023, May 31). *SNAP payment error rate factsheet*. <https://www.fns.usda.gov/snap/qc/payment-error-rate-factsheet>

⁷⁸ Thrasher, Dory (June 10, 2026). Balancing SNAP Accuracy and Access: Pay Attention to CAPERs. FRAC Chat. <https://frac.org/blog/balancing-snap-accuracy-and-access-pay-attention-to-capers>

- The PER does not measure barriers to SNAP access or participation. Error rates do not capture households that are prohibited from enrolling in SNAP because they cannot complete the enrollment process, for example, when they cannot reach a SNAP eligibility worker to complete the required interview. While states may have metrics for applications begun but not completed, there is no official performance measure for this critical area of concern.
- The PER does not measure the timeliness of case processing. SNAP agencies are required to process an application within 30 days (or 7 days for cases eligible for expedited processing). USDA calculates a timeliness rate, which is the share of cases processed on time.
- SNAP payment error rates do not measure program abuse or fraud. SNAP errors result from complex eligibility rules and outdated technology. They reflect human error, such as mis-typed numbers or incomplete information gathered during eligibility interviews; the challenges of working with computer systems that may not allow copy-and-paste or let workers overwrite updated information; and changing household circumstances that mean information submitted at application does not match what QC reviewers find months later.

With all this in mind, relying on payment error rates as a comprehensive performance metric obscures other critical aspects of program administration and leads to misleading conclusions about program effectiveness.

Factors Affecting Payment Error Rates

Payment error rates are highly sensitive to operational conditions.

The most significant increases often follow rollouts of new eligibility systems, which can introduce errors directly and overwhelm staff responsible for identifying and correcting them. Staffing shortages, early retirements, and economic downturns further reduce administrative capacity and increase vulnerability to error.

Case complexity is another critical factor. Households with stable, fixed incomes, such as older adults receiving retirement benefits, rarely generate payment errors. By contrast, households with fluctuating earnings or changing household composition require frequent reassessments and carry a much higher risk of error, particularly because the information a household submits at application may differ from what a QC worker finds when reviewing the case months later. States and localities serving a disproportionate share of these cases typically report higher error rates, even when administrative performance is strong.

State policy choices also shape error rates. Eliminating the asset test removes an entire category of potential errors. Longer certification periods paired with interim reporting can

reduce risk by limiting how often eligibility factors must be reverified. Conversely, extensive verification requirements and inaccurate or unreliable data matches often divert staff time toward documentation, increasing technical errors without improving substantive accuracy.

Federal measurement standards further complicate interpretation. USDA has periodically changed what qualifies as an error, including its 2022 decision to begin counting certain “technical errors”—paperwork deficiencies in otherwise accurate cases. This change caused error rates to rise in some states even though households received the correct benefit amounts and were substantively eligible.⁷⁹

Payment Error Examples

- An eligibility worker correctly processes an application by conducting the interview, requesting verification, and confirming household composition, residency, and other factors in a timely manner. During a subsequent QC review, a reviewer notices that a landlord verification form lists the rent amount, landlord name, address, and client information but omits the landlord’s phone number. Even though the missing phone number has no effect on eligibility or the benefit amount, QC standards still count the case as an error.
- An eligibility worker correctly determines a household’s eligibility and benefit amount, and the household timely submits its required interim report showing no change. Because the office is severely understaffed, the worker cannot process the report by the due date, and later confirms that eligibility and benefit amounts were accurate for every month. Under USDA’s revised QC rules, reviewers nonetheless count the benefits issued after the due date as a payment error.

The Largest Fraud Threat Facing SNAP Today: Benefit Theft

If Congress wishes to address the most significant fraud, waste, and abuse problem affecting SNAP households today, it should focus on benefit theft.

Over the past several years, organized criminal networks have increasingly targeted SNAP recipients through skimming devices, card cloning operations, phishing schemes, and cyber-enabled theft. The victims are eligible SNAP participants who have already undergone extensive eligibility verification. Criminals steal benefits directly from recipients' Electronic Benefit Transfer (EBT) accounts, often emptying entire monthly allotments within minutes.

⁷⁹ American Public Human Services Association. (2023). *Comment letter on SNAP Quality Control (QC) Review Handbook (FNS Handbook 310)*. https://aphsa.org/wp-content/uploads/2024/10/2023-07-13_APHSA-Comment-Letter-on-SNAP-Quality-Control-310-Handbook.pdf

The scope of the problem is substantial. Between 2023 and December 2024, states approved nearly 679,000 claims for stolen SNAP benefits and replaced more than \$320 million in benefits under temporary federal replacement authority.⁸⁰ These figures likely underestimate the true extent of the problem because many victims never report theft, discover it too late to qualify for replacement, or exceed statutory limits on replacement.

Unequal Consumer Protections

A major distinction between SNAP recipients and traditional banking customers is the absence of comparable consumer protections for SNAP users. The Federal Electronic Funds Transfer Act (EFTA) and Regulation E protect holders of commercial debit and credit cards.^{81,82} These holders also benefit from fraud protection, liability limits, reimbursement procedures, real-time transaction monitoring, and chip-enabled cards. Financial institutions absorb the costs of unauthorized transactions and invest heavily in fraud prevention.

Congress excluded EBT transactions from these protections under the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA). As a result, SNAP recipients generally lack comparable legal recourse when benefits are stolen through skimming, card cloning, or similar forms of electronic theft.⁸³

In late December 2022, Congress passed a law to protect SNAP benefits and replace those stolen through card skimming, card cloning, and similar methods. The law required states to replace benefits stolen between Oct. 1, 2022, and Sept. 30, 2024.⁸⁴ The Continuing Appropriations and Extensions Act, 2025, revised the end date of the benefit theft period

⁸⁰ U.S. Government Accountability Office. (2025). GAO-25-107964 [PDF]. <https://www.gao.gov/assets/gao-25-107964.pdf>

⁸¹ 15 USC CHAPTER 41, SUBCHAPTER VI: ELECTRONIC FUND TRANSFERS. (2018). House.gov. <https://uscode.house.gov/view.xhtml?req=granuleid%3AUSC-prelim-title15-chapter41-subchapter6&edition=prelim>

⁸² 12 CFR Part 1005 - Electronic Fund Transfers (Regulation E). (n.d.). Consumer Financial Protection Bureau. <https://www.consumerfinance.gov/rules-policy/regulations/1005/>

⁸³ (10) Applicable law. Disclosures, protections, responsibilities, and remedies established by the Federal Reserve Board under section 904 of the Electronic Fund Transfer Act (15 U.S.C. 1693b) shall not apply to benefits under this Act delivered through any electronic benefit transfer system. "Text - H.R.3734 - 104th Congress (1995-1996): Personal Responsibility and Work Opportunity Reconciliation Act of 1996." Congress.gov, Library of Congress, 22 August 1996, <https://www.congress.gov/bill/104th-congress/house-bill/3734/text>

⁸⁴ Tom, C. (2023). Text - H.R.9747 - 118th Congress (2023-2024): Continuing Appropriations and Extensions Act, 2025. Congress.gov. <https://www.congress.gov/bill/118th-congress/house-bill/9747/text>

from Sept. 30, 2024, to Dec. 20, 2024.⁸⁵ The American Relief Act of 2025 did not extend this authority to benefits stolen beyond December 20, 2024.⁸⁶

This creates a two-tiered system of consumer protection. Most Americans rely on payment systems backed by modern security standards and statutory protections, while SNAP households continue to depend on magnetic-stripe EBT cards with fewer safeguards.

For households already living on extremely limited incomes, the consequences are severe. When benefits are stolen, families may lose their primary source of food purchasing power for an entire month. The burden of fraud falls not on USDA or payment processors, but on households least able to absorb the loss.

Outdated Payment Technology and System Vulnerabilities

The limited consumer protections available to SNAP recipients are compounded by the continued use of outdated payment technology.

Financial institutions largely abandoned magnetic-stripe cards because the information stored on the stripe can be easily copied to create counterfeit cards.⁸⁷ Chip-enabled cards generate dynamic transaction data that is much harder to replicate, making many common forms of card fraud far less effective.⁸⁸

Ongoing reliance on magnetic stripe technology has created a persistent vulnerability in the SNAP payment system. Criminal organizations can capture card information with skimming devices, produce counterfeit cards, and rapidly drain benefits from recipient accounts. Because SNAP benefits are distributed on predictable schedules and many recipients receive them only once a month, stolen benefits are often exhausted before victims become aware of the theft.

Recognizing these vulnerabilities, federal and state agencies have begun pursuing EBT modernization initiatives. California became the first state to fully implement chip-enabled EBT cards, and several other states have launched modernization efforts or participated in federal pilot projects using chip technology and contactless payment systems.

⁸⁵ Tom, C. (2023). *Text - H.R.9747 - 118th Congress (2023-2024): Continuing Appropriations and Extensions Act, 2025*. Congress.gov. <https://www.congress.gov/bill/118th-congress/house-bill/9747/text>

⁸⁶ Tom, C. (2023). *Text - H.R. 10545 - 118th Congress (2023-2024): American Relief Act, 2025*. Congress.gov. <https://www.congress.gov/bill/118th-congress/house-bill/10545/text>

⁸⁷ Almeda, A. J. (2024, December 31). *MAGNETIC STRIPE CARD VS CHIP CARD: WHICH IS BETTER?* Credit Card Processing & Merchant Services - Unicorn Group; Unicorn Group. <https://ugpayments.ch/blog/magnetic-stripe-card-vs-chip-card/>

⁸⁸ *Chip Card Explained: How It works, Benefits, and Real-World Examples - SuperMoney*. (2024, October 23). SuperMoney. <https://www.supermoney.com/encyclopedia/credit-card-chip>

Federal and State Responses: Progress, Gaps, and Unintended Consequences

Federal and state agencies have taken important steps to reduce SNAP benefit theft. USDA has encouraged states to implement stronger PIN requirements, transaction alerts, card-locking tools, fraud monitoring, public education campaigns, and coordination with EBT processors and law enforcement.⁸⁹

These measures improve fraud awareness and account management, but they do not address the primary vulnerability: the continued use of magnetic-stripe EBT cards. Most prevention efforts require recipients to repeatedly change PINs, monitor accounts, or manage card settings, placing responsibility on households rather than addressing weaknesses in the payment system itself.⁹⁰

The private banking sector has largely mitigated these risks through EMV chip technology, contactless payments, advanced fraud detection, and comprehensive consumer liability protections that prevent or absorb losses before they affect customers.⁹¹

Federal oversight has also remained limited. The Government Accountability Office (GAO) found that USDA has not comprehensively assessed which anti-theft measures states have implemented, how effective those measures are, or what barriers states face in adopting them.⁹² As a result, policymakers continue to operate without a complete understanding of which interventions reduce fraud and which merely shift burdens onto recipients.

The Burden of Recipient-Based Security Measures

Many anti-fraud strategies promoted to address SNAP skimming place responsibility on recipients rather than on the systems responsible for safeguarding benefits. Card-locking applications, transaction alerts, account-management portals, and other recipient-facing security tools are often presented as effective fraud-prevention measures. However, these tools assume that participants have reliable internet access, smartphones, digital literacy, and the time and ability to actively monitor their accounts. For many SNAP households, those assumptions do not reflect reality.

⁸⁹ *Addressing Stolen SNAP Benefits* | Food and Nutrition Administration. (2026). Usda.gov. <https://www.fna.usda.gov/snap/stolen-benefits>

⁹⁰ *Addressing Stolen SNAP Benefits* | Food and Nutrition Administration. (2026). Usda.gov. <https://www.fna.usda.gov/snap/stolen-benefits>

⁹¹ Stewart, Kevin, J. (2025, October). *EMV at 10*. Digital Transactions. https://www.digitaltransactions.net/magazine_articles/emv-at-10/

⁹² GAO-25-107964 Q&A Report to Congressional Committees . (2025, September 25). *Nutrition Assistance: USDA Should Comprehensively Assess Benefit Theft Prevention Measures States Are Implementing*. <https://www.gao.gov/assets/gao-25-107964.pdf>

The digital divide remains a significant barrier across the United States. Although internet use is widespread, nearly 24 million Americans remain offline, and millions more lack affordable broadband, an appropriate device, or the digital skills needed to navigate increasingly complex online systems.^{93,94,95} Digital inclusion requires more than internet access; it depends on affordable broadband, a suitable device, digital skills, and ongoing technical support.⁹⁶

Older adults may be unfamiliar with mobile applications or account-management systems. Individuals with disabilities may encounter accessibility barriers.^{97,98} Households experiencing homelessness often lack reliable access to phones, charging stations, internet connectivity, or secure places to store account information. Rural households may face broadband limitations, while individuals with limited English proficiency may encounter language barriers when navigating security tools.⁹⁹

Even among households with access to technology, fraud-prevention measures can create confusion and inconvenience. A recipient who forgets to unlock a card before shopping may find that benefits cannot be used at checkout. Someone who receives a transaction alert may not know whether the activity is legitimate. Others may struggle to reset PINs, reach customer service, or navigate online account systems.

The burden becomes particularly concerning when the responsibility for preventing organized criminal activity is placed on the victims of that activity rather than on the institutions responsible for administering secure payment systems. Research on administrative burden demonstrates that increasingly digital public benefit systems can

⁹³ GovFacts. (2025, November 25). GovFacts. GovFacts. <https://govfacts.org/housing-infrastructure/broadband-telecommunications/digital-divide/americas-digital-divide-the-people-left-behind/>

⁹⁴ Gelles-Watnick, R. (2024, January 31). *Americans' Use of Mobile Technology and Home Broadband*. Pew Research Center. <https://www.pewresearch.org/internet/2024/01/31/americans-use-of-mobile-technology-and-home-broadband/>

⁹⁵ Vogels, E. A. (2021, August 19). *Some digital divides persist between rural, urban and suburban America*. Pew Research Center. <https://www.pewresearch.org/short-reads/2021/08/19/some-digital-divides-persist-between-rural-urban-and-suburban-america/>

⁹⁶ National Digital Inclusion Alliance. (2017, January 18). *Definitions*. National Digital Inclusion Alliance. <https://www.digitalinclusion.org/definitions/>

⁹⁷ Jokisch, M. R., Schmidt, L. I., Doh, M., Marquard, M., & Wahl, H.-W. (2020). The role of internet self-efficacy, innovativeness and technology avoidance in breadth of internet use: Comparing older technology experts and non-experts. *Computers in Human Behavior*, 111, 106408. <https://doi.org/10.1016/j.chb.2020.106408>

⁹⁸ Rivers, W. (2025, September 29). *Why Do Elderly Struggle With Technology? - Senior Strong*. Senior Strong. <https://www.seniorstrong.org/why-do-elderly-struggle-with-technology/>

⁹⁹ Vogels, E. A. (2021, August 19). *Some digital divides persist between rural, urban and suburban America*. Pew Research Center. <https://www.pewresearch.org/short-reads/2021/08/19/some-digital-divides-persist-between-rural-urban-and-suburban-america/>

create additional barriers that disproportionately affect low-income households and other vulnerable populations, reducing access to benefits even among eligible individuals.¹⁰⁰¹⁰¹

No comparable expectation exists for most commercial banking customers. Consumers are not expected to manually protect themselves from every potential fraud scheme because financial institutions have invested in technologies and protections designed to reduce risk. SNAP recipients need the same level of protection.

Transaction Blocking

One of the most significant emerging anti-fraud strategies involves blocking online and out-of-state transactions.

Federal officials have noted that stolen SNAP benefits are frequently redeemed outside a recipient's home state or through online transactions. In response, USDA has developed pilot initiatives that would allow states to automatically block certain transactions unless recipients actively authorize them.¹⁰²

Although intended to reduce fraud, transaction blocking raises significant concerns regarding access, equity, and program administration.

SNAP participants regularly engage in legitimate out-of-state shopping. Individuals living in border communities often purchase groceries across state lines because the closest retailer may be located in a neighboring state. Rural residents frequently travel significant distances to access affordable food retailers. Some communities depend on regional shopping patterns that cross state boundaries as a normal part of daily life.

Online purchasing presents similar concerns. Many older adults, individuals with disabilities, and households lacking transportation rely on online grocery purchasing options. During and after the COVID-19 pandemic, online purchasing became an increasingly important tool for improving food access among vulnerable populations.

¹⁰⁰ Hegemann, M., & Ritz, A. (2026). Administrative burden in digital service provision: a systematic literature review and research agenda. *Perspectives on Public Management and Governance*.

<https://doi.org/10.1093/ppmgov/gvag004>

¹⁰¹ Tuvel, E. (2022, April 18). *Digital Services and Administrative Burdens - New Jersey State Policy Lab*. New Jersey State Policy Lab - the New Jersey State Policy Lab (NJSPL) Conducts Rigorous, Evidence-Based Policy Research for Communities in the Garden State. <https://policylab.rutgers.edu/publication/digital-services-and-administrative-burdens/>

¹⁰² *USDA Expands Safeguards for SNAP Benefits with Pilot Targeting Out-of-State Fraud | Peer TA Network - TANF*. (2024). Hhs.gov. <https://peerta.acf.hhs.gov/content/usda-expands-safeguards-snap-benefits-pilot-targeting-out-state-fraud>

Automatic transaction blocking means recipients may arrive at a grocery store or attempt an online purchase only to discover their account has been restricted. They must then navigate a process to unlock their card or authorize the transaction before completing their purchase.

For households already facing food insecurity, even temporary disruptions can have serious consequences.

These concerns are particularly relevant in states that participate in transaction-blocking initiatives or implement enhanced security restrictions. Policymakers must balance fraud prevention with the statutory requirement that SNAP remain accessible and usable for eligible households. Security measures that prevent legitimate purchases may inadvertently undermine the program's fundamental purpose: helping families access food.

Congress should prioritize solutions that address this growing threat, including stronger EBT security standards, expanded chip-card implementation, improved cybersecurity protections, permanent replacement authority for stolen benefits, and continued investments in payment modernization.

A Balanced Approach to Integrity

Congress should continue supporting strong oversight and accountability within SNAP. However, oversight should be grounded in evidence and focused on outcomes.

Program integrity should include preventing fraud, reducing errors, protecting benefits from theft, ensuring timely access for eligible households, and maintaining public confidence in taxpayer investments.

An integrity framework that focuses exclusively on payment errors risks creating incentives that reduce participation among eligible households without meaningfully reducing fraud. The SNAP payment error rate is an important quality control tool, but it was never intended to serve as a comprehensive measure of state performance or as the basis for imposing substantial financial penalties. Treating the PER as a standalone performance metric ignores the complexity of SNAP administration, decades of chronic underinvestment in state agencies, and the many operational factors that influence error rates. States may respond by adding verification requirements, increasing procedural hurdles, or delaying approvals. While such actions may improve certain administrative metrics, they can also increase hunger among eligible households.

The goal should not be to choose between accuracy and access. Effective SNAP administration requires both.

As Congress evaluates future SNAP policy, it should ensure that performance measures reflect the program's dual responsibility: safeguarding taxpayer dollars while ensuring that

eligible Americans can obtain the nutrition assistance they need to remain healthy, productive, and food secure.

Policy Recommendations

To strengthen SNAP integrity while protecting access for eligible households, Congress should consider the following recommendations:

1. Focus Fraud Prevention Efforts on Benefit Theft and Organized Criminal Activity

Congress should prioritize combating EBT skimming, card cloning, phishing, and other forms of benefit theft that have resulted in hundreds of millions of dollars in stolen SNAP benefits nationwide. Specifically, Congress should:

- accelerate nationwide implementation of chip-enabled EBT cards and secure payment technologies.
- invest in cybersecurity protections for EBT systems.
- strengthen fraud detection and monitoring capabilities.
- permanently authorize federal replacement of stolen SNAP benefits.
- support coordination among USDA, states, payment processors, retailers, and law enforcement agencies.

2. Preserve Federal Investments in SNAP Administration

Program integrity depends on administrative capacity. Congress should reconsider provisions that reduce federal support for SNAP administration and instead ensure states have sufficient resources to:

- hire and retain trained eligibility workers.
- modernize eligibility and case-management systems.
- improve fraud detection and prevention efforts.
- conduct quality assurance and quality-control activities.
- improve customer service and application processing.

Reducing administrative resources while increasing state responsibilities will make it more difficult, not easier, to improve accuracy and accountability.

3. Evaluate State Performance Using Multiple Measures

Payment error rates provide important information, but they do not measure overall program performance. Congress should require USDA to report additional indicators alongside payment error rates, including:

- call center answer rates and wait times

- churn rates
- participation among eligible households
- customer service metrics
- rates of benefit theft and recovery

A more balanced performance framework would provide a more complete assessment of program effectiveness.

4. Support Technology Modernization and Operational Improvements

Many SNAP errors stem from outdated systems, workforce shortages, and administrative complexity. Congress should provide targeted investments to help states:

- modernize eligibility systems
- improve electronic verification processes
- simplify document submission
- improve interoperability among data systems
- expand digital tools while maintaining accessibility for individuals with limited technology access.

Modernization efforts should improve both accuracy and customer experience.

5. Strengthen Quality-Control Systems While Maintaining Access

The SNAP Quality Control system remains an important accountability tool. Congress should continue to support robust quality-control reviews and corrective action efforts while ensuring that performance measures do not create incentives that discourage participation among eligible households.

States should be encouraged to address the root causes of errors through training, process improvements, and system modernization, rather than by imposing additional procedural barriers.

6. Ensure Adequate Technical Assistance and Federal Support

USDA plays a critical role in helping states improve payment accuracy and program administration. USDA's decision to relocate and cut its workforce will impact USDA's ability to support integrity efforts. Congress should ensure USDA has the staffing and resources necessary to:

- provide technical assistance
- conduct root-cause analyses
- share best practices
- support state modernization efforts

- assist states in implementing new statutory requirements

Strong federal-state partnerships have historically been one of the primary reasons SNAP maintains high levels of accountability.

7. Protect Access While Promoting Accountability

Program integrity and program access are complementary goals, not competing objectives. Congress should evaluate policy changes based on whether they:

- improve payment accuracy
- reduce fraud and theft
- maintain or improve access for eligible household.
- reduce administrative burden
- strengthen customer service
- improve long-term food security outcomes

Policies that reduce SNAP participation among eligible households without addressing the underlying causes of errors or fraud ultimately weaken both program effectiveness and public confidence.

8. Reassess the Use of Payment Error Rates as the Basis for State Benefit Cost-Sharing

Payment error rates were intended as a quality-control and management tool, not as a mechanism to shift SNAP benefit costs to states. Congress should evaluate whether tying state benefit-cost obligations to payment error rates creates unintended incentives that encourage procedural barriers, increase churn, reduce participation among eligible households, and divert resources from technology modernization and fraud prevention efforts.

States should be encouraged to improve accuracy through investments in administrative capacity and continuous improvement rather than through fiscal penalties that may undermine access and increase food insecurity.