Ronald Ward
Acting Associate Administrator
Supplemental Nutrition Assistance Program
Food and Nutrition Service
U.S. Department of Agriculture

October 17, 2025

Dear Acting Associate Administrator Ward,

On behalf of the National Association of Counties (NACo) and the National Association of County Human Services Administrators (NACHSA), we respectfully urge the U.S. Department of Agriculture's Food and Nutrition Service (FNS) to extend the hold harmless period related to the implementation of the recent changes to Supplemental Nutrition Assistance Program (SNAP) work requirements under H.R. 1.

Counties are responsible for administering SNAP in ten states, representing approximately 34 percent of total participants, or 14.6 million people. Counties and state agencies are working tirelessly to make significant updates to case management systems to reflect the expanded definition of Able-Bodied Adults Without Dependents (ABAWD) and the elimination of exemptions for veterans, individuals experiencing homelessness, and certain former foster youth. These system changes, coupled with the need for substantial community outreach to ensure affected households fully understand the new requirements, will require time and resources to implement effectively.

Given these operational realities, we urge FNS to provide additional flexibility and extend the hold harmless period to ensure that inadvertent errors during implementation are not counted against Quality Control measures. This additional time will allow counties and states to make the necessary updates and conduct meaningful engagement with communities, while continuing efforts to reduce payment error rates.

Thank you for your consideration and continued partnership. We look forward to working with FNS to support the smooth and effective implementation of these changes. If you have questions or would like additional information, please contact Julia Cortina, NACo Associate Legislative Director at jcortina@naco.org or Tom Joseph, NACHSA Washington Representative at tj@paragonlobbying.com.

Sincerely,

Matthew D. Chase
CEO/Executive Director
National Association of Counties

Debbie-Ann Anderson
President
National Association of County Human Services Administrators

RESOLUTION NO. _______

TO THE HONORABLE BOARD OF SUPERVISORS OF ______________ COUNTY, WISCONSIN MEMBERS,

WHEREAS, the federal budget reconciliation package enacted in July of 2025, makes changes to the SNAP (FoodShare) program that would reduce federal costs and significantly impact county-administered services; and

WHEREAS, these changes extend SNAP work requirements to individuals up to age 64, lower the child age threshold for parent exemptions, and eliminate waivers for areas with high unemployment, thereby increasing referrals to the FoodShare Employment and Training (FSET) program and workload for county human service departments; and

WHEREAS, the legislation requires states to contribute a minimum of 5% toward the cost of SNAP benefits if their error rate is 6% or higher, facing penalty funding of between 5% and 15% of total SNAP costs; and;

WHEREAS, Wisconsin's current SNAP payment error rate is 4.47%, but without additional investment in eligibility and administrative systems, heightened workloads could push the state above the 6% threshold, triggering significant penalties; and

WHEREAS, if Wisconsin's error rate reaches 6% on or after October 1, 2027, the state's 5% cost share would be approximately $69 million annually, with potential penalty payments increasing the state's financial burden—costs that could ultimately cascade down to counties; and

WHEREAS, the SNAP administrative match rate for Income Maintenance (IM) activities has been reduced from the previous 50% federal / 50% state-local to 25% federal / 75% state-local, substantially reducing federal revenue available to counties to administer SNAP; and

WHEREAS, the reduction in administrative funds could lead to a reduction in IM staff, which could result in an increased payment error rate; and

WHEREAS, county IM administrative costs are approximately $123 million annually, with SNAP-related workload accounting for about $49 million of those costs; and

WHEREAS the new administrative match rate results in an estimated $17 million annual loss in SNAP administrative funding to counties; and

WHEREAS, these federal cuts result from shifting the benefit and administrative costs to states and counties (reducing resources available for local administration), tightening work requirements (increasing county workload), and penalizing minor payment errors (resulting in more cost to the states); and

WHEREAS, counties operate under state-imposed property tax levy limits, restricting their ability to offset such funding losses without additional state or federal relief;

NOW, THEREFORE, BE IT RESOLVED that the ______ County Board of Supervisors urges the State of Wisconsin to provide funding to offset the county fiscal impact caused by the enacted federal SNAP changes, and to work with counties to ensure adequate resources for the administration of FoodShare and related programs; and

NOW, THEREFORE BE IT RESOLVED that the _______ County Board of Supervisors urges the State of Wisconsin to provide funding by supporting the request from the Wisconsin Department of Health Services through the 2025 AB 387/SB 390 as part of the state budget correction bill; and

BE IT FURTHER RESOLVED that the _____ County Clerk is hereby authorized and directed to send a copy of this Resolution to the Governor of the State of Wisconsin, Wisconsin State Legislators with a constituency within ______ County, the Wisconsin Counties Association, and the Wisconsin County Human Service Association.

Respectfully submitted this ______ day of ________________, 2025.

[COMMITTEE]

October 14, 2025

Members of the Wisconsin State Legislature:

The "One Big Beautiful Bill Act" (OBBBA) signed into law on July 4, 2025, contained several significant changes to the Supplemental Nutrition Assistance Program (SNAP). The Wisconsin Department of Health Services (DHS) has estimated **$69.2 million in GPR is needed** to implement these changes in Wisconsin's FoodShare program in this biennium and has made a request to the legislature for that funding, including:

- $32.4 million to cover the increase in the state share of administrative costs from 50% to 75%.
- $16.1 million for additional DHS and county staff positions to achieve and maintain an error rate below 6%.
- $20.7 million to support an increase in participation in the FoodShare Employment and Training (FSET) program due to expanded work requirements.

The 98 local, regional, and statewide undersigned organizations ask the Wisconsin State Legislature to fully and immediately support DHS's funding request as a part of AB387/SB390, the "budget correction" bill. It is critical for this funding to be provided soon; over 43,000 people are at risk of losing basic food necessities if they don't get the help they need to meet work requirements.

Thank you for your consideration, and please reach out to organizations located in your district and/or serving your constituents for more information about their interest in ensuring adequate funding for administration of these critical programs.

Respectfully,

ADRC of Vilas County

Aging and Disability Professionals Association of Wisconsin

All Saints Catholic Food Pantry

ATC Storehouse Food Pantry

Autumn West Safe Haven

Badger Prairie Needs Network

Black Leaders Organizing for Communities (BLOC)

Blessed Savoir Christian Fellowship

Citizen Action of Wisconsin

Community Center of Hope

Community Food Pantry of Merrill, WI

Community Living Connections

Concerned Citizen of WI & USA

Congregation Emanu-El B'ne Jeshurun

Couleecap Inc.

Covenant Lutheran Church

Dane County

Disability Rights Wisconsin

Door County Pantry Coalition

Eau Claire County

Ebenezer COGIC Food Pantry

Emmanuel United Church of Christ Food Pantry

Employment Resources Inc

Essentially Empowered Inc

Exodus Transitional Care Facility

Faith In Action Washburn Co., D.B.A.- Neighbor to Neighbor

Feeding America Eastern Wisconsin

Feeding Wisconsin

Fondy Food Pantry

Good Samaritan Westside Community church

Good Will Place Food Pantry

Greater Wis. Agency on Aging Resources

Grow It Forward Inc.

Hmong American Friendship Assn Inc

Homeless Advocacy Team of Stoughton

Howard Young/Lakeland Pantry

Hunger Task Force

Independence First

Jewish Community Pantry of the Harry & Rose Samson Family Jewish Community Center

JustDane

Kewaunee County Food Pantry

Kids Forward

Lafayette County Food Pantry

Leaders of Kenosha

League of Women Voters of Beloit

League of Women Voters of Wisconsin

Lisbon Presbyterian Church

Lord's Cupboard Food Pantry

Lutheran Office for Public Policy in Wisconsin

Maroon Calabash

Mercer Area Food Pantry

Midstate Independent Living Choices, Inc.

Milwaukee Community Crossroads

Milwaukee County Commission on Aging

Milwaukee Jewish Food Pantry

Moms Mental Health Initiative

Mother of Perpetual Help Food Pantry

NAMI Wisconsin

Necedah Food Pantry

Northwoods Community Food Pantry

NourishMKE

Operation Bootstrap

Peshtigo Food Pantry

Project Concern of Cudahy/St Francis

Rainbow House

Repairers of the Breach

Resources and Beyond

Respite Care Association of Wisconsin (RCAW)

Rooted & Rising - Washington Park

Safe Communities Coalition

Shalom Center

Sharing Center Inc.

Siggenauk Center Food Pantry

SOAR (Supporting Opportunities for Advocacy & Resilience)

St. Joe's Food Program, Inc.

St. John's United Church of Christ

St. Stephen Lutheran Food Pantry

Stockbridge Munsee Community

Stonehouse Counseling

Survival Coalition of Wisconsin Disability Organizations

Sussex Outreach Services

The Gathering of Southeast Wisconsin, Inc.

The Hunger Task Force of La Crosse, Inc.

The Lord's Cupboard Inc.

The Neighbors' Place

Tosa Community Food Pantry

Triangle Community Ministry

Waunakee Senior Center

Wisconsin Aging Advocacy Network

Wisconsin Association of Local Health Departments and Boards

Wisconsin Board for People with Developmental Disabilities

Wisconsin Council of Churches

Wisconsin Counties Association

Wisconsin County Human Service Association

Wisconsin Grocers Association

Wisconsin Medical Society

Wisconsin Public Health Association

Wisconsin Counties Association

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CALL TO ACTION: Ask your state Senator and Representative to support DHS's funding request as part of AB 387/SB 390 (the budget correction bill already introduced).

Federal changes to the Supplemental Nutrition Assistance Program (SNAP), known as FoodShare in Wisconsin, will put people at risk of losing access to needed food assistance. If the state does not take action quickly, these changes and reduced funding will put county staff and budgets at risk.

The federal reconciliation bill (H.R. 1), signed into law July 4, 2025, made cuts and changes that require Wisconsin to increase its share of the financing needed to run the FoodShare program. Beginning November 1, county Income Maintenance workers must handle all current FoodShare duties plus verify additional work requirement cases without any added staff or funding. County budgets are insufficient to cover the increased costs and reduction in federal funding.

Wisconsin counties need the Legislature's support to increase state funding so the FoodShare program can continue operating effectively and in compliance with federal requirements. Wisconsin is a top performer nationally, ranking in the top 5 lowest error rates in the country in 2024 (4.47%) compared to the national average (10.93%).

Now, the county IM workers must continue all the work they currently do to run a successful program, and the additional work that is required by H.R. 1. The Wisconsin Department of Health Services (DHS) estimates 43,700 more people will have to "prove they are working" to keep FoodShare. This and other changes will add to the time and complexity of individual cases.

It is important for state lawmakers to know what it would mean if FoodShare benefits were delayed, reduced, or went away.

FUNDING NEEDED TO COMPLY WITH FEDERAL REQUIREMENTS:

- **$16.1M** for 56 more workers to make sure Wisconsin's error rate stays low. Keeping Wisconsin's error rate low helps Wisconsin avoid penalties of up to $205M that the federal government would charge the state beginning in October 2027.
- **$32.4M** for administrative costs that the federal government used to pay but is now shifting to states.
- **$20.7M** to make sure all the people who get SNAP are working enough to get food assistance benefits or qualify for an exemption.

WHAT ARE THE FEDERAL CHANGES TO FOODSHARE?

Changes to Wisconsin's FoodShare program resulting from H.R. 1 include:

- Expanding work requirements to include many more people as of July 4, 2025.
- Changing what is considered an error as of October 1, 2025. More things will now be counted as errors than before.
  - If states have more than a 6% error rate, they will be penalized and will have to pay a lot more state money to keep getting federal money for the program, starting October 1, 2028.
- **Increasing the workload of county workers.** Beginning November 1, 2025, county IM workers must handle all current FoodShare duties plus verify additional work requirement cases without any added staff or funding.
- Reducing how much money the federal government gives to states to run the program, beginning October 1, 2026, creating a budget hole for states.
  - Now, federal funding pays 75% of what it costs counties to administer the program. That will be reduced to 50% on October 1, 2026.

QUICK WISCONSIN FOODSHARE FACTS

- 700,000 people in Wisconsin receive FoodShare benefits.
- County IM workers help local people and verify whether they are eligible to get FoodShare.
- People rely on counties to have enough workers and do a good job so that they can apply and get FoodShare in a timely way.
- People with disabilities and adults over age 65 who are exempt from work requirements need a FoodShare system that works well to make sure their benefits are not delayed or mistakenly denied.
- Of Wisconsin FoodShare recipients:
  - More than 60% are in families with children
  - More than 45% are in working families, and
  - More than 36% are in families with members who are older adults or are disabled.
- People with low, fixed incomes are especially vulnerable to rising costs of living (housing, prescriptions, food).
- As other costs go up, people lose jobs, or the economy worsens more people may not be able to afford food without SNAP.

WHO IS IN SNAP IN WISCONSIN?

County/Tribal Nation	# of Individuals Receiving SNAP Benefits*	Percentage of Total County Population Receiving SNAP Benefits**
Adams	3,459	16.48%
Ashland	2,447	15.54%
Barron	5,586	11.88%
Bayfield	1,414	8.72%
Brown	27,019	9.71%
Buffalo	1,028	7.74%
Burnett	2,047	12.32%
Calumet	2,608	4.60%
Chippewa	6,149	8.99%
Clark	3,188	9.03%
Columbia	5,014	8.51%
Crawford	1,920	11.82%
Dane	45,344	7.42%
Dodge	7,705	8.64%
Door	2,015	6.47%
Douglas	5,082	11.42%
Dunn	4,204	9.11%
Eau Claire	10,165	9.06%
Florence	524	11.43%
Fond du Lac	9,649	9.28%
Forest	1,228	13.21%
Grant	4,700	9.07%
Green	2,921	7.78%
Green Lake	1,905	9.99%
Iowa	1,930	8.01%
Iron	774	12.65%
Jackson	2,483	11.61%
Jefferson	6,887	7.93%
Juneau	4,138	15.18%
Kenosha	21,319	12.46%
Kewaunee	1,370	6.62%
La Crosse	10,137	8.14%
Lafayette	1,424	8.50%
Langlade	3,129	16.12%
Lincoln	3,083	10.77%

Manitowoc	7,526	9.29%
Marathon	12,369	8.81%
Marinette	5,475	13.07%
Marquette	1,733	11.12%
Milwaukee	239,576	25.34%
Monroe	5,071	10.83%
Oconto	3,556	9.04%
Oneida	3,495	9.19%
Outagamie	13,465	6.84%
Ozaukee	3,256	3.46%
Pepin	606	8.22%
Pierce	2,103	4.90%
Polk	4,167	9.09%
Portage	5,946	8.19%
Price	1,825	13.07%
Racine	30,071	15.03%
Richland	2,273	13.21%
Rock	23,535	14.17%
Rusk	2,316	16.25%
St. Croix	4,723	4.72%
Sauk	6,982	10.30%
Sawyer	1,930	10.49%
Shawano	4,819	11.69%
Sheboygan	12,398	10.39%
Taylor	1,939	9.60%
Trempealeau	2,533	8.17%
Vernon	2,565	8.17%
Vilas	1,711	7.33%
Walworth	8,431	7.85%
Washburn	2,017	12.04%
Washington	7,177	5.14%
Waukesha	16,381	3.93%
Waupaca	4,982	9.53%
Waushara	2,842	11.56%
Winnebago	17,250	9.91%
Wood	9,939	13.44%
Menominee	2,109	49.40%
Red Cliff	326	
Stockbridge-Munsee	133	
Potawatomi	45	
Lac du Flambeau	1,289	

Bad River	276	
Sokaogon Tribe	182	
Oneida Nation	1,144	
Lac Courte Oreilles	658	
State Total	**696,889**	
* Monthly average for state fiscal year 2025		
**Population Data Sources: https://doa.wi.gov/Pages/LocalGovtsGrants/Population_Estimates.aspx		