



Oct. 20, 2025

Patrick Penn  
Deputy Under Secretary  
USDA Food, Nutrition, and Consumer Services  
1320 Braddock Place  
Alexandria, VA 22314

RE: State SNAP Agency Guidance

Dear Deputy Under Secretary Penn,

On behalf of the National Conference of State Legislatures, the bipartisan organization representing the legislatures of our nation's states, territories, commonwealths and Washington, D.C., we respectfully urge the U.S. Department of Agriculture (USDA) to issue immediate and comprehensive guidance for implementing the Supplemental Nutrition Assistance Program (SNAP) in light of both the ongoing federal government shutdown as well as provisions included in the 2025 budget reconciliation bill.

This request is urgent. States are facing heightened uncertainty and operational challenges in administering SNAP. Despite good faith efforts by states to maintain program integrity and continuity, the absence of clear guidance risks delays in deploying essential updates, confusion among participants, and disruptions in service delivery.

#### **Guidance Needed in Response to the Government Shutdown**

We respectfully request that the USDA prioritize the release of updated guidance to help states manage SNAP applications and claims processing for November. Specifically, NCSL supports the recommendations identified by the American Public Human Services Agency:

- Clarification on processing combined issuances for individuals authorized for benefits spanning mid-late October, especially when states cannot separate October and November benefits.
- Instructions for managing expedited cases and daily issuance files, including whether these instructions apply throughout October or only later in the month.
- Expectations for continued certification, recertification, work requirement reporting, and claims processes if November benefits cannot yet be issued.

**Marcus C. Evans Jr.**  
President, NCSL  
Assistant Majority Leader,  
Illinois

**Lonnie Edgar**  
Staff Chair, NCSL  
Mississippi Joint Legislative  
PEER Committee

**Tim Storey**  
Chief Executive Officer,  
NCSL

- Clear guidance on states' ability to spend and be reimbursed for ongoing administrative and program costs, including SNAP Employment & Training and SNAP Outreach.

### **Guidance Needed for Implementation of the 2025 Budget Reconciliation Bill**

States have been working diligently to implement the substantial changes to SNAP eligibility, work requirements and waiver policies included in the budget reconciliation bill. These changes require significant investments in IT system updates, staff training and community outreach. Much of this work has proceeded in the absence of federal guidance in light of the fact that many of these provisions went into effect immediately upon enactment of the law.

While we appreciate the initial guidance issued in early October, states are still awaiting direction on key provisions, particularly those related to non-citizen eligibility. Given the scope of these changes and the added complexity introduced by the shutdown, we urge the USDA to consider additional flexibilities to support state implementation efforts—including an extension of the hold harmless period.

NCSL members stand ready to work collaboratively with your team to ensure a smooth, equitable, and uninterrupted rollout that upholds the integrity of the program and meets the needs of our communities. We appreciate your attention to this critical matter and look forward to your timely response and continued partnership.

Sincerely,

A handwritten signature in blue ink that reads "Tim Storey". The signature is written in a cursive, flowing style.

Tim Storey

CEO

National Conference of State Legislatures

---