



DCF Legislative Testimony

January 6, 2026

TESTIMONY OF: Laura Howard, Secretary Department for Children and Families

TESTIMONY ON: SNAP Error Rates and Administrative Match

DCF | SNAP Error Rates and Administrative Match

Chair Waymaster and members of the committee, thank you for the opportunity to provide testimony on the Supplemental Nutrition Assistance Program (SNAP) Payment Error Rates (PER) and Administrative Match information. Testimony today includes program background, changes in state match required for program administration, requirements for program participants, and information on the PER.

SNAP BACKGROUND

The Supplemental Nutrition Assistance Program (SNAP) is a federal program administered by the United States Department of Agriculture Food and Nutrition Services (USDA FNS). It is designed to promote the general welfare, and to safeguard the health and well-being, of the nation's population by raising the levels of nutrition among low-income households by supplementing food budgets and providing nutrition education. The program's purpose also includes assisting low-income adults in obtaining employment and increasing their earnings.

SNAP provides crucial support to elderly households, low-income working households, other low-income households that include the unemployed or disabled, and households transitioning back to work. SNAP Food Assistance customers can spend their benefits to buy eligible nutritious food and plants and seeds to grow food for their household to eat.

For SNAP Food Assistance participants, monthly benefits are provided on a Kansas Benefit card, which looks and functions like a debit card. When food is purchased, the cost is electronically subtracted from the individual's account. The card may also be used at enrolled farmers' markets to purchase items such as fresh, locally grown fruits and vegetables. The Kansas Benefit card can only be used at USDA enrolled stores and can only be used for food items.

Employment services programs are available for Food Assistance recipients. Employment services include but are not limited to support in gaining or maintaining employment, transportation assistance, job training, and childcare assistance. Providing information or cooperating with child support is a requirement for Food Assistance in Kansas based on state law, with good cause exceptions allowed.

RECENT FEDERAL LAW CHANGES

The FY 2025 Budget Reconciliation Bill (H.R. 1), signed into law on July 4, 2025, included several updates to the SNAP program regarding a state's required shared (match) contributions for program administration, and potential state share of the benefit costs related to any state's Performance Error Rate (PER) in accuracy of benefit determination, as well as changes to participant eligibility requirements.

SNAP ADMINISTRATIVE COST CHANGES

Prior to October 1, 2026, the administrative costs of SNAP programs are shared 50/50 between federal and state general funds.

H.R. 1 Increases the share of SNAP administrative costs for all states from 50% to 75%, effective October 1, 2026.

- Kansas’ Federal FY 2027 SNAP administrative costs are projected to be over \$66 million.
- The increase in the state match rate from 50% to 75% represents an annual increase of \$16.4 million in state funds. Since the change occurs in October, the first-year impact is \$12.1 million.
- **This administrative cost share change is not connected to state SNAP Payment Error Rates (PER).**

Given the change in federal financial participation for SNAP program administration, DCF initiated an enhancement request through the state agency process for consideration for inclusion in the Governor’s Budget Recommendations (GBR) for \$12.1M for SFY27 (Table 1.)

Without additional funds, SNAP Program administration (primarily eligibility staff) would have to be reduced. This reduction in staffing could increase the SNAP Payment Error Rate (PER), which determines the percentage of SNAP benefits the state must pay. As an example, heavy workloads and pressure to increase processing speed could lead to delayed SNAP benefit reviews and reduced accuracy.

Table 1: Enhancement Request	FY 2026		FY 2027	
	All Funds	SGF	All Funds	SGF
Changes to SNAP Administrative Match Rate	-	-	-	\$12,061,053

CHANGES TO SNAP BENEFITS COSTS

Historically, SNAP benefits have been 100% federally funded. H.R.1 sets forth progressively higher state match rates of cost sharing requirements based on a PER. Specifically, effective October 1, 2027, SNAP error rates 6 percent or greater will require progressively higher state match rates.

- SNAP benefits are different from the SNAP Administrative funding mentioned above.
- In the initial year – FFY 2028 – the matching rate will be based on the state’s choice of either the FFY 2025 or FFY 2026 error rate.
- Beginning in FFY29, and for each subsequent year, the PER from three fiscal years prior will determine the state’s match rate. As a result, FFY29 state match will be based on FFY26 PER, FFY30 on FFY27 PER, etc.

Kansas SNAP Food Assistance benefits are over \$400 million per year. The Kansas PER for FFY 2024 was 9.98%, which was below the national average of 10.23%. The FFY2025 has a cumulative rate through August 2025 of 9.13%. If this error rate is not reduced, the state’s share of SNAP benefits would be over \$40 million in FFY 2028. Again, for Year 1 of the shared benefit costs (which will impact in SFY 2028) the state match will be based on the lesser of the FFY 25 or FFY 26 payment error rates.

Payment Error Rate	State Match Required	Estimated State General Fund Impact
Under 6%	0%	\$0
6% - 7.9%	5%	\$20.7 M
8% - 9.9%	10%	\$41.3 M
10% or higher	15%	\$62.0 M

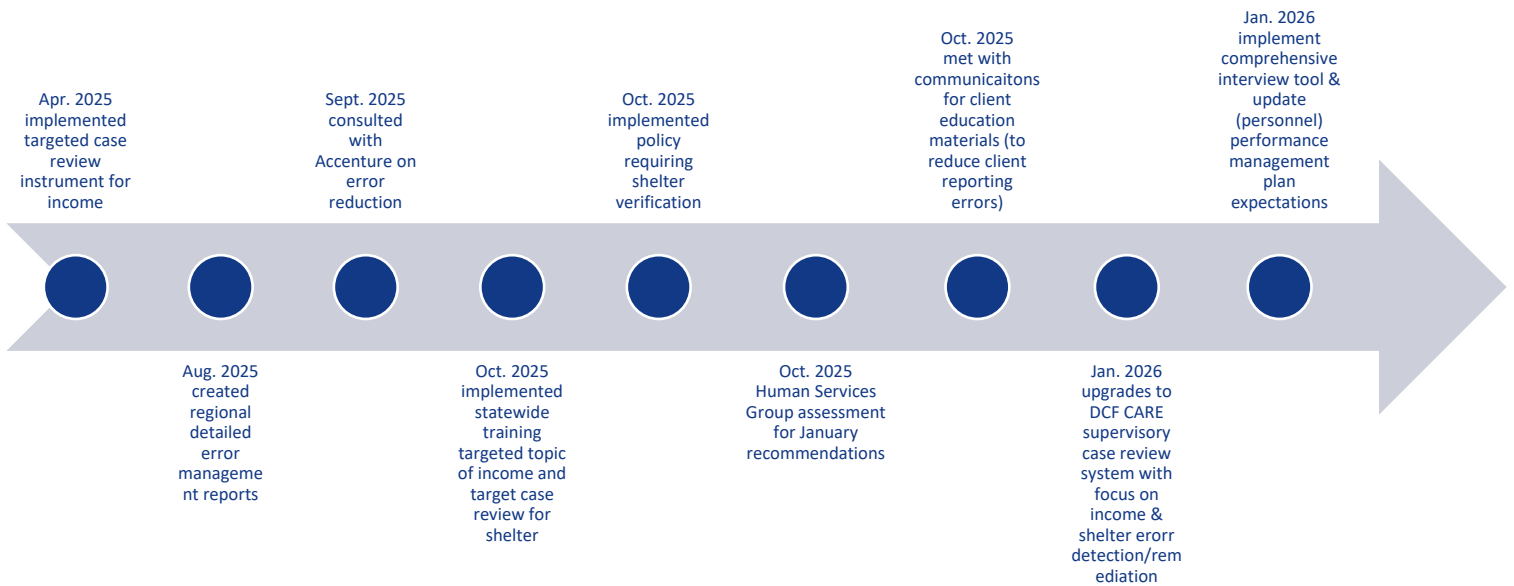
PER INFORMATION AND IMPROVEMENT

DCF is working aggressively to reduce the error rate through an improvement plan. The error rate for FFY 2025 through August was 9.13% and the error rate for August 2025, the most recent case review month available, was 5.50% (Figures 1 and 2.)

The federal government conducts reviews of a state agency’s determinations of eligibility for SNAP benefits to ensure the program’s accuracy and integrity. These reviews are part of the SNAP quality control process, a two-tiered system involving both state and federal evaluations. The federal reviews, conducted by the Food and Nutrition Service (FNS), assess the accuracy of state-level reviews, ensuring that states are properly administering and reporting on the program. FNS works closely with state agencies to minimize case and procedural errors through technical assistance, training for case workers, improving data systems, and implementing new policies and procedures.

There are two aspects of federal review. One of the ways accuracy is measured is through the PER, which assesses the accuracy of state eligibility and benefit determinations for households that received SNAP benefits. The second aspect is a review of cases in which a household is denied SNAP benefits or has their benefits terminated or suspended. Kansas case review includes a sample of about 92 cases per month, and the review results are available about 4 months behind the actual month under review.

An improvement plan has been developed that includes policy and process changes such as verifying shelter costs, upgrading the supervisor case review system, and increasing staff training (*see attached*). DCF has been working with Human Services Group the past three months on a rigorous assessment to identify gaps, determine steps to improve case reviews and monitoring, as well as identify opportunities for system changes (requested in supplemental and enhancement). In addition, DCF was awarded a grant of \$275,000 from Kansas Health Foundation, in collaboration with the Kansas Hunger Network, to improve the PER, which the agency will use to procure technology supports.



Long-term planning includes targeted training on common errors such as interviewing skills, guides to augment questions to gain information not reported in the application process, and technology supports that create efficiencies and improve quality control detection. These supports will help sustain performance with federal threshold requirements.

To lower the PER, supplemental and enhancement funding has been requested for consideration in the GBR process for new technology and system changes. Changes (Table 2), in priority order are:

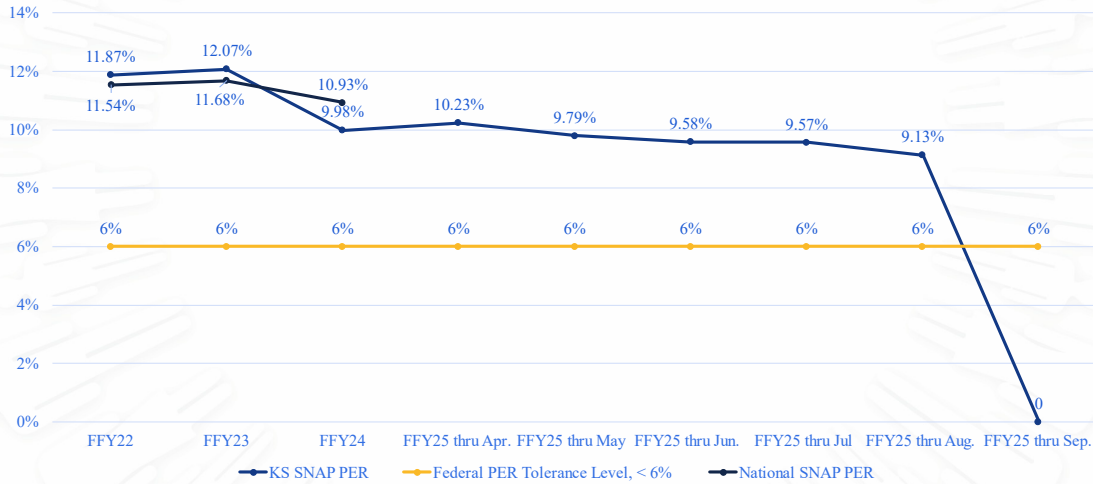
Table 2: State General Fund Supplemental/Enhancement Budget Item	FY 2026	FY 2027
Update ABAWD determination logic in the KEES system	\$162,639	\$0
Integrate National Accuracy Clearinghouse with the KEES system	\$594,663	\$0
Quality assurance application to review error prone case types	\$780,000	\$30,000
Proactive automated communications with clients	\$900,000	\$175,000
Consultant review of processes and systems	\$360,000	\$0
KEES system change requests following consultation	\$0	\$1,408,960
Total	\$2,797,302	\$1,613,960

Figure 1

KS SNAP FFY cumulative Payment Error Rate (PER)



Figure 1: Rev. 11/19/25, FFY History with FFY25 Cumulative Monthly Case Review results. Data is 4 months behind. Zero (0) means no data yet.



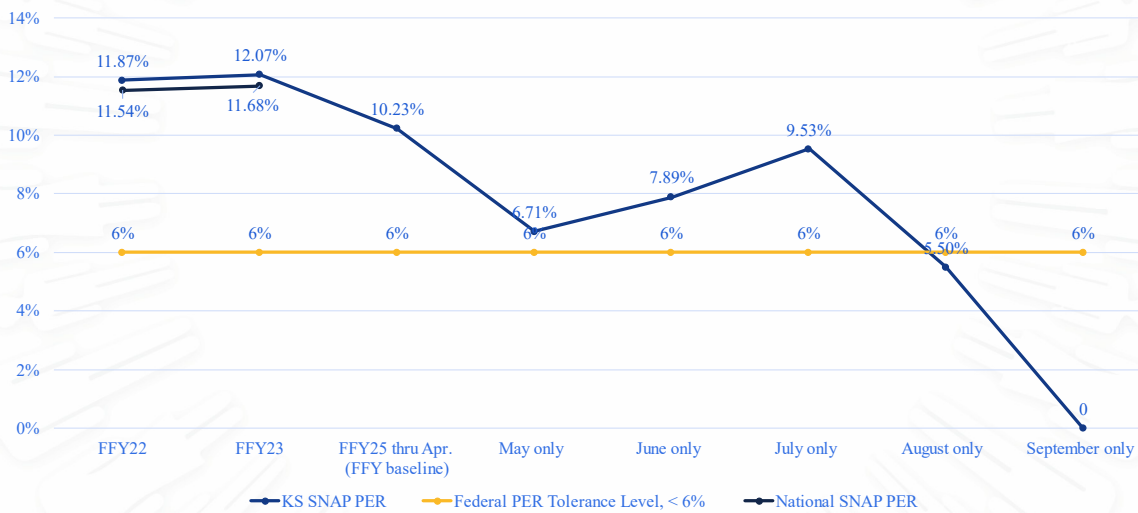
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Figure 2

SNAP Monthly PER



Figure 2: FFY 25 monthly (only) case review results across (about) 92 cases read monthly. Data is 4 months behind. Zero (0) means no data yet.



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OTHER SNAP CHANGES IN H.R.1

H.R.1 whole program adjustments include changes to how energy assistance and internet costs are considered in calculating households' monthly benefits (impacts 57,806 households), restricts changes to the Thrifty Food Plan (the conceptual market basket used to set monthly benefits) to food inflation (affects all SNAP participants), terminates the Nutrition Education and Obesity Prevention Grant Program (SNAP Education), and ends SNAP eligibility for people granted refugee, asylum, or certain other immigration statuses (impacts 4,039 persons). Further, the federal guidance expands SNAP participant work requirements:

- Raises the age of able-bodied adults without dependents (ABAWD) who must participate in the SNAP work program from 60 to 64. *(approximately 2,800 additional persons)*
 - *ABAWDs can only receive three (3) months of SNAP Food Assistance in a 36-month period while they are not meeting work requirements.*
 - *Mandatory participation of 30 hours per week in an approved SNAP Employment and Training Program is required for these individuals.*
- Lowers the work exemption for parents with children under 18 to those with children under 14. *(approximately 10,284 persons)*
- Removes the work exemption for people experiencing homelessness, under 24, young adults who age out of foster care, and veterans. *(approximately 3,760 persons)*
- An estimated 1,951 additional adults will participate in the SNAP work program. *(Assumes 9.3% will participate)*. This impact will more than double the current 1,400 work participants.

Given the change in federal guidance regarding participant eligibility, DCF initiated a supplemental and enhancement request through the state agency process for consideration for inclusion in the Governor's Budget Recommendations (GBR) for additional administrative (salary, benefits and operating expenses) and participant expenditures. FY 2026 assumes three months of expenditures due to the timing of appropriations. (Table 3)

Table 3: Item	FY 2026		FY 2027	
	All Funds	SGF	All Funds	SGF
SNAP E&T Work Requirement Changes	\$819,712	\$819,712	\$3,167,693	\$3,167,693