NATIONAL EDUCATION ASSOCIATION

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September 8, 2026

Submitted via www.federalregister.gov

Stephen A. Vaden
Deputy Secretary
Food and Nutrition Administration
U.S. Department of Agriculture
1320 Braddock Place
Alexandria, VA 22314

Re: FNA-2026-0034; Supplemental Nutrition Assistance Program: Changes in Federal-State Administrative Cost Sharing

Dear Deputy Secretary Vaden:

On behalf of the approximately three million members of the National Education Association (NEA), including classroom teachers, education support professionals, school nurses, counselors, foodservice professionals, and other school support staff, we submit these comments in response to the United States Department of Agriculture's (USDA) Food and Nutrition Administration (FNA) proposed rule, *Supplemental Nutrition Assistance Program: Changes in Federal-State Administrative Cost Sharing*, published in the Federal Register on June 24, 2026. **NEA strongly opposes the proposal to reduce the federal reimbursement rate for most SNAP administrative costs from 50 percent to 25 percent beginning in Fiscal Year 2027. This change would strain state budgets and administrative capacity while creating barriers to enrollment and benefit retention for eligible families. USDA should withdraw this proposal and maintain the current reimbursement rate.**

NEA has a direct interest in this proposal because effective SNAP administration has implications not only for participating households, but also for the students, families, schools, and communities in which our members work and live. Our members work with K-12 students in public schools in more than 14,000 communities across the country and see firsthand the consequences when families lose access to nutrition assistance. SNAP participation is a key pathway to automatic eligibility and direct certification for free school meals, meaning that disruptions in SNAP access can also jeopardize students' seamless access to school meals. When access to both SNAP and school meals is disrupted, students may arrive at school hungry, struggle to focus, exhibit challenging behaviors, and fall behind academically. Protecting the effective administration of SNAP is therefore not only a matter of ensuring access to household nutrition assistance; it is also critical to ensuring that students can access the school meals they need to be healthy, supported, and ready to learn.[1]

Cuts to SNAP administrative reimbursement rates are not merely bureaucratic or logistical changes. By making it more difficult for states to administer the program and for eligible families to participate, they risk increasing food insecurity and its impact on students and school communities. As families encounter greater barriers to receiving benefits, educators are increasingly called upon to meet students' basic needs and respond to the resulting challenges in the classroom, diverting time and attention from teaching and learning. At the same time, many educators are facing increased food insecurity and financial hardship in their own households.[2] These pressures underscore the importance of maintaining, rather than reducing, the administrative capacity needed to ensure that eligible households can access SNAP benefits. When SNAP administration functions effectively, families receive timely assistance, students are more likely to have reliable access to food at home and school, and educators can focus on teaching and supporting students rather than addressing preventable nutrition-related needs.

Since H.R. 1 was enacted in July 2025, millions of people have been affected by changes to SNAP eligibility and benefits, including students.[3] This proposal would shift billions of dollars in administrative costs from the federal government to states, even as states implement the most significant SNAP policy changes in decades. These changes require additional staffing, system modifications, training, quality control activities, public education, technology upgrades, and customer assistance, not fewer resources. The reduction in federal funding may force states to make difficult budget decisions that could reduce administrative capacity and hinder effective program operations. At a time when states are being asked to implement significant changes to SNAP eligibility and administration, reducing federal support for those administrative functions risks undermining states' ability to carry out those responsibilities effectively. USDA should not impose additional costs on states while simultaneously asking them to implement major new administrative requirements.

Ensuring that students have reliable access to nutritious food is critical to academic success, supports a positive school climate, and helps create the conditions all students need to lead healthy, successful lives. **For these reasons, NEA is deeply concerned that USDA's proposed reduction in the federal reimbursement rate for most SNAP administrative costs would undermine the administrative capacity states need to ensure eligible families can access and retain SNAP benefits. NEA strongly urges USDA to withdraw this proposal and maintain the current federal reimbursement rate.**

SNAP Is an Education Issue

SNAP is the nation's first line of defense against food insecurity, particularly for children living in

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[1] https://frac.org/wp-content/uploads/breakfast-for-behavior.pdf
[2] https://www.nea.org/about-nea/media-center/press-releases/trump-and-his-allies-are-choosing-hunger-over-help-release-funds-now-protect-snap-and-feed-millions
[3] https://www.cbpp.org/research/food-assistance/snap-tracker-people-are-losing-food-assistance-as-the-harmful-2025

poverty.[4] An estimated 13.8 million children live in food-insecure households, and the effects of poverty and food insecurity can have lasting consequences for student health and academic success.[5] Children experiencing food insecurity are twice as likely to be in fair or poor health compared with their food-secure peers and face higher risks of conditions such as asthma, obesity, cardiovascular issues, anxiety, and depression.[6] Children experiencing poverty are also two to three times more likely to be chronically absent, meaning they miss at least 10 percent of school days, and health challenges associated with food insecurity contribute to missed school days.[7] The effects of chronic absenteeism are often most severe for students in low-income communities, where schools may have fewer resources available to help students recover lost learning.

While the SNAP benefits each household receives are relatively modest, averaging just $6 per person per day, the program provides a critical lifeline for the health and well-being of children, lifting millions of families out of poverty and improving food security.[8] [9] USDA research demonstrates that food insecurity among children fell by roughly one-third after their families received SNAP benefits for six months, and that 17 percent of participating households were lifted above the federal poverty line when SNAP benefits were included in gross income. The benefits of SNAP are particularly significant for young children, with research linking access to SNAP during pregnancy and early childhood to improved birth outcomes and stronger long-term health, educational, and employment outcomes. SNAP participation has also been associated with lower rates of child maltreatment reports and involvement with the child welfare system.[10]

Because SNAP's effectiveness depends on states' ability to fully fund and administer the program, reductions in federal administrative support will undermine access to these benefits and have broader consequences for students and schools. When children lose access to SNAP, they also risk losing access to other sources of nutritious food because SNAP participation provides automatic eligibility for several key child nutrition programs, including free school meals, WIC, and Summer EBT.[11] Together, these programs form a critical safety net against child hunger. As a result, reductions in SNAP participation under this proposal could have cascading effects on children's health, school attendance, and academic success, particularly in high-poverty communities.

USDA Has Not Adequately Demonstrated the Rule's Impacts

USDA estimates that this rule will shift approximately $16.9 billion in administrative costs from the federal government to states between FY 2027 and FY 2031.[12] Despite acknowledging that the proposal would shift substantial costs to states, USDA concludes that the rule will have "no changes

[4] https://www.cbpp.org/research/food-assistance/nearly-2-million-young-children-in-the-us-lived-in-food-insecure
[5] https://frac.org/wp-content/uploads/HSMFA-State-Advocacy-Guide.pdf
[6] https://www.psychologytoday.com/us/blog/origins-of-health/202510/food-insecurity-harms-child-development?msockid=031b06792aa665fa2d8610c42b1064d8
[7] https://www.attendanceworks.org/chronic-absence/the-problem/
[8] https://frac.org/blog/characteristics-report-by-usda-provides-insights-into-who-participates-in-snap
[9] https://www.cbpp.org/research/food-assistance/nearly-2-million-young-children-in-the-us-lived-in-food-insecure
[10] https://www.cbpp.org/research/food-assistance/nearly-2-million-young-children-in-the-us-lived-in-food-insecure
[11] https://frac.org/wp-content/uploads/Cuts-SNAP-Threaten-Child-Nutrition-Programs.pdf
[12] Federal Register: Supplemental Nutrition Assistance Program: Changes in Federal-State Administrative Cost Sharing, https://www.federalregister.gov/documents/2026/06/24/2026-12696/supplemental-nutrition-assistance-program-changes-in-federal-state-administrative-cost-sharing

in administrative burden" and only a negligible effect on SNAP participation.

When initially published, the proposed rule did not provide the required regulatory impact analysis (RIA) explaining the data, assumptions, methodology, or evidence supporting these conclusions. An RIA was subsequently added to the docket on August 6, 2026. However, the RIA does not meaningfully evaluate how shifting billions of dollars in costs to states will affect program administration, participant access, payment accuracy, staffing, technology modernization, or state budgets. This omission is particularly concerning because USDA acknowledges that "State agencies will have to increase their State administrative expenses to implement other provisions contained in OBBB [H.R.1]," and recognizes that this proposed cost shift could affect SNAP operations, including through longer wait times or processing delays that could reduce access to SNAP.

Still, the Notice of Proposed Rulemaking requests comments "on ways in which this shift in spending from the Federal Government to the States could change overall program spending or program operations."

For NEA, the central concern is therefore not simply the amount of funding available to state SNAP agencies, but whether states will retain sufficient administrative capacity to implement these changes while ensuring that students and families can access nutrition assistance reliably and efficiently. Shifting substantial administrative costs to states without adequately assessing the resulting effects on staffing, processing time, technology, and program operations risks undermining SNAP access, particularly for students and families who depend on timely and accurate administration of the program.

Reduced Federal Administrative Funding Will Have Significant Operational Consequences for SNAP

Reducing the federal share of SNAP administrative costs from 50 percent to 25 percent will make it substantially more difficult for states to administer SNAP effectively, while states are being asked to take on significant new administrative responsibilities. Administrative funding supports the personnel, systems, and activities necessary to administer SNAP effectively, including:

- Hiring, training, and retaining eligibility workers.
- Conducting eligibility interviews and processing applications.
- Timely processing of applications, recertifications, and reported changes.
- Quality control reviews and payment accuracy improvement efforts.
- Fraud prevention, investigations, and program integrity activities.
- Customer service centers and case management.
- Technology modernization and eligibility system improvements.
- Cybersecurity protections and EBT system security.
- Public outreach and multilingual program information required under federal regulations.
- Data matching and verification activities.
- Staff training on complex policy changes.
- Appeals, hearings, and administrative reviews.

Reducing administrative resources while simultaneously increasing administrative responsibilities creates an unsustainable mismatch that will negatively affect both program integrity and participant access, with consequences that extend beyond SNAP agencies to the schools, workplaces, and communities serving families that rely on SNAP.

States are already implementing extensive changes required under H.R. 1. These changes include developing new procedures for determining whether an individual is required to register for work, documenting exemptions, conducting additional screening during certification and recertification, monitoring ongoing compliance, applying sanctions when appropriate, determining when to make referrals, and ensuring that due process requirements are met. Each of these requirements creates additional workload for state agencies and increases the need for sufficient staffing, training, technology, and quality-control capacity. These are not paper-based requirements that can be absorbed without additional capacity. They require states to hire and retain qualified eligibility workers, provide ongoing training, modify eligibility systems, conduct quality assurance, and communicate effectively with participants.

These administrative demands also have direct implications for the public schools and communities in which NEA members work.

In addition to this administrative cost shift beginning in FY 2027, beginning in FY 2028, many states will also be required to contribute directly to SNAP benefit costs based on their payment error rates. This creates a significant policy tension: states are expected to reduce payment error rates and avoid additional penalties tied to benefit costs, yet the federal government is simultaneously reducing the administrative capacity needed to achieve those very outcomes.

States cannot be expected to effectively lower payment error rates, implement corrective action plans, and avoid additional financial penalties if the federal government is reducing administrative support. Effective program integrity requires sustained investment in the staff, technology, training, and oversight necessary to administer SNAP accurately and efficiently.[13] [14] Those investments benefit not only SNAP agencies, but also the students, families and communities served by public schools that depend on reliable access to nutrition assistance. For NEA members and the students they serve, reliable SNAP administration can also help protect access to school meals and reduce the downstream pressures that nutrition insecurity places on students, families, and schools. [15]

Reduced SNAP Access Will Increase Pressure on Public Schools and Communities

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

[14] 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

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

SNAP is not a substitute for schools' responsibilities, nor are schools a substitute for SNAP. Rather, strong nutrition assistance programs and strong public schools are complementary investments that work together to support children's well-being, learning, and long-term success.

Many students are automatically certified for free school meals because their families participate in SNAP. As families lose SNAP benefits under this proposal, some children may also lose the automatic eligibility or direct-certification pathway that makes it easier for them to receive free school meals and may lose access to other child nutrition programs, including Summer EBT and WIC, which use SNAP participation to help identify eligible children. Without automatic enrollment, families must navigate complex application processes and burdensome paperwork requirements, increasing the likelihood that eligible children will lose access to benefits simply because of administrative barriers.[16]

Reduced SNAP participation would also affect schools' ability to participate in the Community Eligibility Provision (CEP), which allows schools with high concentrations of low-income students to offer free meals to all students. Schools can participate in CEP when at least 25 percent of their students are identified as eligible through direct certification or other qualifying methods, including participation in programs such as SNAP, TANF, or Medicaid. As SNAP enrollment declines and fewer students are directly certified, some schools may no longer meet the eligibility threshold for CEP or may find it more difficult to participate because of the financial impact.[17]

Losing eligibility for CEP, or determining that participation is no longer financially viable, could place additional strain on school budgets. Many districts rely on federal school meal reimbursement, including reimbursements associated with CEP, to purchase food, maintain kitchen equipment, and pay staff. Additionally, students who do not qualify for free or reduced-price meals based on household income but currently receive meals at no charge through CEP may be required to pay for meals if their school loses eligibility for or chooses not to participate in CEP.[18]

Families who lose automatic eligibility may instead be required to complete a school meal application to establish their eligibility for free or reduced-price meals. Some families may not complete the application because of language barriers, stigma, fear of negative consequences, or simply being overwhelmed by the process. As a result, many eligible children may lose access to both SNAP and free school meals, leaving them without critical nutrition support at home and at school.[19]

These challenges come at a time when school nutrition programs are already under significant strain and face funding cuts of their own.[20] School districts across the country continue to grapple with rising food and labor costs, staffing shortages, operational challenges, rising meal debt, and insufficient federal reimbursement to cover the cost of CEP.[21] School foodservice professionals,

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[16] https://frac.org/wp-content/uploads/Cuts-SNAP-Threaten-Child-Nutrition-Programs.pdf
[17] https://frac.org/news/cepreportjul2026
[18] https://www.nea.org/resource-library/healthy-school-meals-whats-stake-our-students-and-communities
[19] https://www.nea.org/sites/default/files/2026-03/esp-conference_nutrition-quick-guide.pdf
[20] https://www.edweek.org/policy-politics/trump-admin-cuts-program-that-brought-local-food-to-school-cafeterias/2025/03
[21] https://frac.org/wp-content/uploads/Cuts-SNAP-Threaten-Child-Nutrition-Programs.pdf; https://frac.org/wp-content/uploads/large-school-

whose priority is preparing and serving meals, are increasingly pulled away to process applications, manage meal charges, and follow up on unpaid meal debt.[22] The SNAP cuts passed in H.R. 1, including the proposal to shift a greater share of administrative costs to states, further complicate operations and jeopardize children's access to the nutrition they need to succeed. In a recent survey of school districts, 71 districts (74 percent of respondents) reported concerns about how cuts to SNAP and Medicaid included in H.R. 1 would affect operations and participation.

Reducing federal support for SNAP risks undermining participation in school nutrition programs, weakening the financial stability of school meal operations, jeopardizing CEP participation, and adding new administrative burdens for educators and support staff. At a time when schools are already struggling to meet students' basic needs, USDA should strengthen, not weaken, the nutrition programs that ensure every student has consistent access to the healthy meals they need to succeed in school. USDA should not shift SNAP costs onto states and schools and then expect those institutions to absorb the consequences.

The Rule Will Place Additional Pressure on State Budgets

Increasing states' SNAP administrative costs put nutrition in direct competition with other priorities.

Many states already face budget constraints as they manage rising Medicaid expenditures, disaster recovery costs, and pension obligations amid slowing revenue growth.[23] [24] Increased SNAP costs—both this administrative cost shift and the impending benefit cost shift—force state lawmakers to make difficult decisions about how to allocate limited resources.[25] Additional state expenditures for SNAP administration could compete with other state priorities, including investments in public education, public safety, transportation, public health, and other essential services.[26]

For NEA, the potential impact on education funding is of particular concern. State budgets are interconnected, and new mandatory expenditures in one area can constrain the resources available for other essential public services. States already face significant demands to fund public education due to inconsistencies in federal support. Requiring states to absorb billions of dollars in additional SNAP administrative costs will intensify these competing demands.

As states struggle to absorb reductions in federal administrative reimbursements while balancing their budgets, some will not replace the lost funding, and others will further reduce SNAP funding to manage rising costs in other areas. The result will be more families losing access to essential nutrition assistance and facing increased barriers to obtaining benefits, leading to mounting food insecurity. In turn, more students will experience hunger and resulting health issues, undermining their ability to focus,

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district-report-2026.pdf
[22] https://www.nea.org/sites/default/files/2026-03/esp-conference_nutrition-quick-guide.pdf
[23] Ibid.
[24] 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
[25] Id.
[26] 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

participate, and succeed in the classroom. We therefore urge USDA to withdraw the proposal to cut federal administrative cost reimbursement rate. The Department should not assume that the costs shifted to states will be absorbed without consequences. Before any additional rulemaking is done, a comprehensive analysis should be conducted to examine how increased state SNAP expenditures could affect state and local education systems, as well as rates of child food insecurity, particularly in states and communities with limited fiscal capacity.

The Proposal May Disproportionately Affect Students and Communities with the Greatest Needs

Students from communities of color, students with disabilities, and students living in poverty face disproportionate risks of food insecurity and chronic absenteeism.[27] Often, absences are associated with health conditions and other challenges that can be exacerbated by inadequate nutrition, including diabetes and poor oral health. Children living in poverty also face greater consequences from chronic absenteeism because their schools may have fewer resources to address lost learning.[28]

Cuts to SNAP funding could also compound existing cuts to specialized education programs and other supports that students with disabilities rely on to access instruction and demonstrate what they have learned.

Notably, emerging evidence suggests that SNAP can reduce persistent racial disparities in food insecurity. A 2023 study found that racial disparities in food insecurity were present among low-income households that did not participate in SNAP but not among those that did, suggesting that access to SNAP may help narrow these disparities.[29] Finally, children in high-poverty communities may be disproportionately affected, as some districts and schools could lose eligibility for CEP if fewer students are directly certified through SNAP and other qualifying programs.

Because SNAP access depends in part on states' capacity to administer the program, reductions in federal administrative support could make it more difficult for states to maintain timely and effective access to benefits. The proposal is likely to have an outsized impact on children, particularly children with disabilities, children in high-poverty communities, and children in states with less capacity to absorb the additional administrative costs. If states cannot absorb the loss of federal administrative reimbursement, they may face difficult choices about how to fund SNAP administration, potentially leading to reduced administrative capacity, delays in processing applications and renewals, or other barriers to accessing benefits. [30] These are precisely the outcomes USDA should prevent, not risk, through this rule.

Conclusion

The NEA respectfully submits these comments for consideration and urges USDA to withdraw the proposal to reduce the federal administrative cost reimbursement rate from 50 to 25

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[27] https://www.cbpp.org/research/food-assistance/snap-provides-needed-food-assistance-to-millions-of-people-with-0
[28] https://www.attendanceworks.org/chronic-absence/the-problem/
[29] https://www.cbpp.org/research/food-assistance/nearly-2-million-young-children-in-the-us-lived-in-food-insecure
[30] https://www.cbpp.org/research/food-assistance/nearly-2-million-young-children-in-the-us-lived-in-food-insecure

percent. Students across the U.S. are already experiencing unacceptably high levels of food insecurity, and the devastating effects of hunger on learning, attendance, and academic achievement are well documented. No student should lose access to the food they need to learn and thrive because their family is unable to navigate new administrative requirements for SNAP and school meals. Likewise, no school should be forced to discontinue their free school meal program because additional administrative barriers make it more difficult to identify eligible students.

The federal-state partnership has supported SNAP administration for more than five decades, recognizing that administering a large and complex nutrition assistance program requires sustained federal investment. Reducing federal administrative support while simultaneously expanding state responsibilities risks weakening that partnership at precisely the time when states are being asked to implement significant changes to SNAP eligibility, administration, and program integrity.

The consequences will extend beyond state SNAP agencies. Reduced administrative capacity will make it more difficult for eligible families to access nutrition assistance, increase pressure on community organizations and public schools, and place additional demands on educators and education support professionals who serve students and families. For NEA, ensuring that students have consistent access to nutritious food is essential to student well-being, family stability, strong public schools, and thriving communities.

NEA therefore urges USDA to withdraw the proposed reduction in federal SNAP administrative funding and maintain the current reimbursement rate. Federal investment in effective SNAP administration is an investment in children, families, public schools, and the communities they serve. USDA should not reduce that investment when states are already being asked to do more with less.

Please do not hesitate to contact me or Bianca Singh at BSingh@nea.org, should you have any questions.

Sincerely,

Daaiyah Bilal-Threats
Senior Director, Education Policy and Implementation Center
National Education Association