

**MEMO** Published December 3, 2025 • 7 minute read

# Making Sure Federal Nutrition Programs Work

**Annie Shuppy, Zach Moller & Rory Gaudette**



Every month, more than 40 million Americans use the Supplemental Nutrition Assistance Program (SNAP) to help put food on the table.<sup>1</sup> It is one of the most visible and vital safety nets in our country. Because of its size and importance, it's essential to ensure that SNAP operates efficiently—serving households in need and ensuring waste and fraud don't siphon resources away from those who need it.

In this report, we explore SNAP with a particular focus on how well the program is working, something known as *program integrity*. We break down key facts on SNAP, examine ongoing challenges within the program, and explain how recent policy changes in the One Big Beautiful Bill Act could affect oversight and delivery. Ultimately, policymakers from both parties share a responsibility to make SNAP more efficient, accountable, and responsive to the people it serves.

*This report is part of a program-by-program series looking at program integrity issues throughout the federal budget—efforts that cut back on waste and fraud and make sure government programs work. For*

more information, visit our series page [here](#).

## Fast Facts: SNAP & Program Integrity

1. **Support:** SNAP is the largest anti-hunger program in America. The program provides monthly funds to buy groceries and helps 41 million people annually.<sup>2</sup>
2. **Eligibility & Administration:** SNAP eligibility is based on income and assets. In general, households must have a gross monthly income at or below 130% of the federal poverty line, net income at or below 100% of the poverty line, and assets below \$3,000 or \$4,500 (depending on family composition).<sup>3</sup> While the federal government funds most of the program, state agencies administer SNAP and can determine additional eligibility rules and benefit levels. Families apply for assistance through their local SNAP offices.<sup>4</sup>
3. **Payment Errors:** The SNAP improper payment rate (how often there was an over or under payment) was 11.7% for FY 2024.<sup>5</sup> SNAP's error rate is more than twice Medicaid's rate of 5.1% and notably higher than the Medicare rate of 7.7%. The vast majority of improper payments in SNAP were overpayments.
4. **Fraud:** SNAP fraud comes in three forms: recipient fraud, retailer fraud, and benefit theft.<sup>6</sup> Recipient fraud happens when someone misrepresents their income, sells benefits for cash, and enrolls in multiple states. Retailer fraud includes exchanging benefits for cash and selling items not allowed for purchase with SNAP benefits. Benefit theft involves illegally taking control of someone else's benefits through methods such as card skimming and card cloning.
5. **Theft:** State SNAP agencies replaced over \$320 million in stolen benefits with federal funds for nearly 679,000 households in FY 2023 and FY 2024. This theft is often from stolen electronic benefits transfer (EBT) cards, according to the Government Accountability Office.<sup>7</sup>
6. **Quality Control:** SNAP Quality Control goes through the states first. State agencies review a sample of household case files looking for underpayments and overpayments.<sup>8</sup> Errors are often unintentional, stemming from both state agencies or households—such as failure to report a change in income. The US Department of Agriculture (USDA) does a secondary review of state-reviewed cases and uses the final data to analyze national and state payment error rates. The department also determines the amount of financial liability for states whose programs exceed certain error rates—which can involve paying the liability immediately or sharing 50% of the cost to address the root cause of the errors.<sup>9</sup>

## Existing SNAP Program Integrity Efforts

Strong program integrity efforts ensure that SNAP dollars reach those who qualify while preventing errors, misuse, or fraud. These efforts often involve upgrading technology, improving data systems,

and streamlining administration. For example:

## **State Anti-Theft Efforts**

State SNAP agencies have implemented several measures to prevent benefit theft, including allowing recipients to lock their EBT cards to prevent unauthorized transactions. For example, California has modernized its SNAP EBT cards to better align with credit and debit card industry security standards to help prevent benefit theft. Six other states have ongoing SNAP EBT card modernization projects.<sup>10</sup> Additionally, USDA is in the process of developing a proposed rule to increase use of secure payment technologies.

## **Congressional Efforts**

The FY 2023 appropriations law included federal funding to replace stolen SNAP benefits and required state SNAP agencies to submit a plan for the replacement of stolen benefits to USDA.<sup>11</sup> The benefits replacement provision expired in December 2024, and members of Congress have introduced legislation to make replacement of stolen SNAP benefits permanent.<sup>12</sup>

Separately, a Republican bill introduced in the House would expand the investigative powers of the USDA inspector general, provide for the replacement of stolen benefits, and create a federal civil penalty for SNAP benefit theft.<sup>13</sup>

## **SNAP Fraud Framework & Other Federal Anti-Fraud Efforts**

USDA has an official policy framework when dealing with SNAP fraud issues. This SNAP Fraud Framework covers recipient integrity education, analytics and data management, and employee training in fraud detection.<sup>14</sup> Benefit Theft Prevention includes sting operations and tech modernization such as rollout of chip card readers.<sup>15</sup> USDA has pursued new efforts to address SNAP EBT theft, including pilots to allow state SNAP agencies to automatically block certain types of potentially fraudulent transactions and better prevent the use of unauthorized EBT point-of-sale terminals.<sup>16</sup>

Beyond benefit theft, USDA also has mechanisms to make it harder for recipients to commit fraud. The SNAP National Accuracy Clearinghouse was created to provide an interstate data matching system to prevent recipients enrolling in multiple states.<sup>17</sup>

## **Other Program Integrity Efforts**

The USDA Office of Food and Nutrition Services has recently taken steps to reduce improper payments. These include:

- Dashboards for states to analyze root causes of improper payments and trends over time.
- Listening sessions with states focused on understanding their successes and challenges in reducing SNAP improper payments.

- Office hours to train regional office staff on updated guidance for improving and maintaining payment accuracy.

## Recent SNAP Program Integrity Changes

Through both administrative action and the One Big Beautiful Bill Act, several key elements of SNAP have changed. Broadly speaking, the Trump Administration has framed them as strengthening accountability and better targeting the program to provide nutritious food to those who cannot work. However, some changes risk exacerbating program integrity issues by adding administrative complexity, risking uneven enforcement, and creating new double standards. Specific changes include:

**Restricting purchases of “non-nutritious” items:** The Administration is encouraging states to pursue policy waivers that can restrict SNAP purchases of items like soda and candy. While there is debate around the value of including non-nutritious food in the SNAP program, implementation is likely to produce confusion and inconsistent enforcement without consistent rules. And this will strain oversight capacity in states.<sup>18</sup>

**Expanding work requirements for able-bodied adults:** The OBBBA expanded SNAP’s work requirements for able-bodied adults without dependents, raising the age limit for work to 65 and narrowing exemptions for veterans, foster youth, and the homeless. This expansion will likely increase errors due to paperwork errors or non-enforcement by states rather than deter fraud. An analysis by Brookings scholars notes that the new rules will make SNAP less responsive during economic downturns, while the Center on Budget and Policy Priorities projects significant benefit losses as states struggle to keep up with enforcement and documentation.<sup>19</sup> This work requirement expansion can be waived for states with unemployment rates above 10%, but in the event of a recession, there may be notable pressure to change this policy to help get benefits out the door faster. This pressure to push benefits out during a policy change creates risks for fraud.

**Creating cost-sharing for states with high error rates:** States with payment error rates above 6% must now cover part of SNAP benefit costs, ranging from 5% to 15%, while low-error states remain fully federally funded.<sup>20</sup> On paper, that incentivizes accuracy and is potentially reasonable. However, if a state’s 2025-2026 error rate exceeds 20%, which includes states like Alaska, they will be exempt from this cost-sharing for up to two years.<sup>21</sup> That’s the opposite impact on incentivizing payment accuracy.

## ENDNOTES

1. Feeding America, “What is SNAP and How to Apply,” Feeding America, <https://www.feedingamerica.org/our-work/hunger-relief-programs/snap>. Accessed 21 November 2025.
2. Feeding America, “What is SNAP and How to Apply,” Feeding America, <https://www.feedingamerica.org/our-work/hunger-relief-programs/snap>. Accessed 21 November 2025.
3. Center on Budget and Policy Priorities, “A Quick Guide to SNAP Eligibility and Benefits,” Center on Budget and Policy Priorities, 3 October 2025, <https://www.cbpp.org/research/food-assistance/a-quick-guide-to-snap-eligibility-and-benefits>. Accessed 21 November 2025.
4. United States Department of Agriculture, “SNAP State Directory of Resources,” Food and Nutrition Service, 30 January 2025, <https://www.fns.usda.gov/snap/state-directory>. Accessed 21 November 2025.
5. SNAP released numbers in mid-2025 reporting a FY 2024 SNAP national payment error rate of 10.93% (overpayment: 9.26%, underpayment: 1.67%). These numbers don’t include fraud cases. For purposes of making accurate comparisons, we used the Biden administration numbers from PaymentAccuracy.gov.

United States Department of Agriculture, “Fiscal Year 2024 SNAP Quality Control Payment Error Rates,” Food and Nutrition Service, 30 June 2025, <https://fns-prod.azureedge.us/sites/default/files/resource-files/snap-fy24QC-PER.pdf>. And; Payment Accuracy, “Payment Accuracy: The Numbers,” PaymentAccuracy.gov, <https://www.paymentaccuracy.gov/payment-accuracy-the-numbers/>. Accessed 21 November 2025.
6. United States Department of Agriculture, “SNAP Fraud Fact Sheet,” Food and Nutrition Service, May 2018, <https://fns-prod.azureedge.us/sites/default/files/snap/SNAP-Fraud-Fact-Sheet.pdf>. Accessed 21 November 2025.
7. U.S. Government Accountability Office, “Nutrition Assistance: USDA Should Comprehensively Assess Benefit Theft Prevention Measures States Are Implementing, GAO-25-107964,” U.S. Government Accountability Office, 25 September 2025, <https://www.gao.gov/products/gao-25-107964#:~:text=Fast%20Facts,can%20identify%20areas%20for%20improvement>. Accessed 21 November 2025.

8. U.S. Department of Agriculture, “SNAP Quality Control,” *Food and Nutrition Service*, 27 Aug. 2025, <https://www.fns.usda.gov/snap/qc>. Accessed 24 Nov. 2025.
9. U.S. Department of Agriculture, “SNAP Quality Control,” *Food and Nutrition Service*, 27 Aug. 2025, <https://www.fns.usda.gov/snap/qc>. Accessed 24 Nov. 2025.
10. U.S. Government Accountability Office, “Nutrition Assistance: USDA Should Comprehensively Assess Benefit Theft Prevention Measures States Are Implementing, GAO-25-107964,” U.S. Government Accountability Office, 25 September 2025, <https://www.gao.gov/products/gao-25-107964#:~:text=Fast%20Facts,can%20identify%20areas%20for%20improvement>. Accessed 21 November 2025.
11. United States Congress, “Consolidated Appropriations Act, 2023, Public Law No: 117-328, 117th Cong. (2022),” Congress.gov, 29 December 2022, <https://www.congress.gov/bill/117th-congress/house-bill/2617/text>. Accessed 21 November 2025. And; United States Department of Agriculture, “SNAP — Sunset of Replacement of Stolen Benefits Plans,” Food and Nutrition Service, 23 December 2024, <https://www.fns.usda.gov/sunset-stolen-benefits-replacement-plan>. Accessed 21 November 2025.
12. U.S. House of Representatives Office of Congresswoman Grace Meng, “MENG, LAWLER, & FETTERMAN Introduce Bipartisan Bill to Return Stolen SNAP Benefits,” U.S. House of Representatives Office of Congresswoman Grace Meng, 5 May 2025, <https://meng.house.gov/media-center/press-releases/meng-lawler-fetterman-introduce-bipartisan-bill-return-stolen-snap>. Accessed 21 November 2025. And; United States Congress, “Fairness for Victims of SNAP Skimming Act of 2025, H.R. 3117, 119th Cong. (2025–2026),” Congress.gov, 30 April 2025, <https://www.congress.gov/bill/119th-congress/house-bill/3117/text?s=1&r=2>. Accessed 21 November 2025.
13. United States Congress, “SNAP Anti-Theft and Victim Compensation Act of 2025, H.R. 3887, 119th Cong. (2025–2026),” Congress.gov, 10 June 2025, <https://www.congress.gov/bill/119th-congress/house-bill/3887/text>. Accessed 21 November 2025.
14. U.S. Department of Agriculture, “SNAP Fraud Framework”, *Food and Nutrition Service*, 13 Jun. 2025, <https://www.fns.usda.gov/snap/fraud-framework>. Accessed 24 Nov. 2025.

15. U.S. Department of Agriculture, “SNAP Fraud Framework”, *Food and Nutrition Service*, 13 Jun. 2025, <https://www.fns.usda.gov/snap/fraud-framework>. Accessed 24 Nov. 2025.
16. U.S. Government Accountability Office, “Nutrition Assistance: USDA Should Comprehensively Assess Benefit Theft Prevention Measures States Are Implementing, GAO-25-107964,” U.S. Government Accountability Office, 25 September 2025, <https://www.gao.gov/products/gao-25-107964#:~:text=Fast> Facts, can%20identify%20areas%20for%20improvement. Accessed 21 November 2025.
17. U.S. Department of Agriculture, “SNAP National Accuracy Clearinghouse (NAC),” *Food and Nutrition Service*, 17 Sep. 2025, <https://www.fns.usda.gov/snap/nac>. Accessed 24 Nov. 2025.
18. Center on Budget and Policy Priorities, “Limiting Food Choice in SNAP Will Undermine Health and Dignity,” Center on Budget and Policy Priorities, 17 October 2025, <https://www.cbpp.org/blog/limiting-food-choice-in-snap-will-undermine-health-and-dignity>. Accessed 21 November 2025.
19. Brookings Institution, “SNAP Cuts in the One Big Beautiful Bill Act Will Significantly Impair Recession Response,” Brookings Institution, 8 October 2025, <https://www.brookings.edu/articles/snap-cuts-in-the-one-big-beautiful-bill-act-will-significantly-impair-recession-response/>. Accessed 21 November 2025. And; Center on Budget and Policy Priorities, “Many Low-Income People Will Soon Begin to Lose Food Assistance Under Republican Megabill,” Center on Budget and Policy Priorities, 10 September 2025, <https://www.cbpp.org/research/food-assistance/many-low-income-people-will-soon-begin-to-lose-food-assistance-under>. Accessed 21 November 2025.
20. United States Department of Agriculture, “SNAP Provisions of the One Big Beautiful Bill Act of 2025 – Information Memorandum,” Food and Nutrition Service, 4 September 2025, <https://www.fns.usda.gov/snap/obbb-implementation>. Accessed 21 November 2025.
21. The New York Times, “Murkowski Casts Decisive Vote for G.O.P. Policy Bill, Making an ‘Agonizing’ Choice,” The New York Times, 1 July 2025, <https://www.nytimes.com/2025/07/01/us/politics/murkowski-republican-bill.html>. Accessed 21 November 2025.

