

OH, SNAP!

**FEDERAL POLICY CHANGES
THREATEN THE STABILITY
OF FLORIDA'S
SUPPLEMENTAL NUTRITION
ASSISTANCE PROGRAM**

December 2025





106 North Bronough Street, Tallahassee, FL 32301 floridatxwatch.org o: 850.222.5052 f: 850.222.7476

Dominic M. Calabro
President & Chief Executive Officer

David Casey
Chairman of the Board of Trustees

DEAR FELLOW TAXPAYER,

The federal Supplemental Nutrition Assistance Program (SNAP) is the largest anti-hunger program in the United States. SNAP, formerly the Food Stamps Program, provides funding for food products to citizens, and some non-citizens, who meet low-income eligibility requirements. SNAP supports our nation's most vulnerable populations, serving a diverse population of children (39 percent), elderly individuals (20 percent), and nonelderly individuals with a disability (ten percent), although any citizen who meets the income eligibility requirements is eligible. Ensuring vulnerable populations can satisfy their basic needs is critical to promoting the general welfare of our state and our country.

The federal "One Big Beautiful Bill Act," signed by the President in July 2025, altered SNAP policies in ways that could dramatically affect state budgets and operations. Perhaps most significantly, one provision establishes a tiered matching fund requirement for states with SNAP payment error rates higher than six percent. Florida has one of the highest SNAP payment error rates in the country (15.13 percent). This new policy will penalize the state, requiring a matching fund rate as high as 15 percent. Understanding and preparing for the coming changes is essential to safeguarding food security and fiscal stability in the State of Florida.

Florida TaxWatch undertakes this independent research project to examine how the upcoming changes in SNAP requirements will impact Florida's budget and its ability to provide much needed food assistance to needy Floridians. We look forward to discussing these critical findings with Florida legislators during the upcoming 2026 Legislative Session.

Sincerely,

A handwritten signature in black ink that reads "Dominic M. Calabro".

Dominic M. Calabro
President & CEO

TABLE OF CONTENTS

Dear Fellow Taxpayer	1
Executive Summary.....	3
Introduction	5
SNAP in the United States ~Before the OBBB Act~	6
SNAP in Florida	7
<i>Administration</i>	7
<i>Eligibility and Benefits</i>	7
<i>Application Process</i>	9
<i>Number of SNAP Participants</i>	9
<i>Costs of SNAP</i>	10
<i>Quality of SNAP</i>	12
Effects of the One Big Beautiful Bill Act.....	14
<i>Section 10101. Re-evaluation of Thrifty Food Plan (Effective Immediately)</i>	14
<i>Section 10102. Modifications to SNAP Work Requirements for Able-Bodied Adults (Effective Immediately)</i>	14
<i>Section 10105. Matching Funds Requirements (Effective FY2028)</i>	15
<i>Section 10106. Administrative Cost Sharing (Effective FY 2026)</i>	15
<i>Section 10107. National Education and Obesity Prevention Grant Program (Effective Immediately)</i>	16
<i>Section 10108. Alien SNAP Eligibility (Effective Immediately)</i>	16
Conclusions and Recommendations	16



EXECUTIVE SUMMARY

Administered by the United States Department of Agriculture's (USDA)'s Food and Nutrition Service (FNS), the Supplemental Nutrition Assistance Program (SNAP) provides funds to help low-income households afford low-cost, nutritious meals. In July 2025, President Trump signed the One Big Beautiful Bill Act of 2025 (the OBBB Act), tightening SNAP policies that determine eligibility, benefits, and program administration. Florida TaxWatch undertakes this independent research project to better understand how the upcoming changes in SNAP requirements will impact Florida's budget and its ability to provide much needed food assistance to needy Floridians.

Before the OBBB Act, households equal to or below the 200 percent Federal Poverty Level were eligible for SNAP benefits. Certain groups, including non-citizens without legal status and postsecondary students enrolled at a college half-time or more, were excluded. Non-citizens with legal status must meet additional eligibility requirements, such as maintaining legal residency for at least five years. All benefit allocations are based on a low-cost, nutritious food plan designed by the USDA, referred to as the "Thrifty Food Plan." The amount received by household varies by household size and income. Benefits are disbursed on Electronic Benefit Transfer (EBT) cards and are only accepted by certain grocery and convenience vendors.

Intended as a pathway to self-sufficiency, SNAP requires most recipients to meet established work requirements. Before the OBBB Act, the General Work Requirement required individuals aged 16 to 54 to participate in the SNAP Employment and Training Program or work at least 30 hours per week. Able-bodied adults without dependents (ABAWDs) aged 18 to 54 must also meet the Additional Work Requirement to continue receiving benefits after the initial three months. Both work requirements exempt certain populations.

In Florida, SNAP is administered by the Office of Economic Self-Sufficiency (ESS), housed within the Department of Children and Families (DCF). The guidelines for SNAP are flexible, allowing states to tailor the program in a way that best serves its residents. For example, the State of Florida opted out of a provision that disqualifies convicted

felons from receiving SNAP benefits, in hopes of reducing recidivism rates, and adopted stricter work requirements than other states, mandating certain individuals participate in the SNAP Employment and Training Program and disqualifying entire households if one household member fails to satisfy their work requirements.

Over the past ten years, Florida's participation rate has mostly hovered between 1.5 million and 2.0 million households. The counties with the most participants are typically the counties with the highest population count. Nationwide, Florida ranked 18th in SNAP reliance, with a participation rate of 12.7 percent of the total population (roughly one-in-eight Floridians).

In FY2023, Floridians received more than \$6 billion of issued SNAP benefits, with the average benefit per person providing \$191.06 per month. In the same year, Florida's total administrative cost was \$273 million; however, it is worth noting that the COVID-19 pandemic temporarily increased the demands upon SNAP and states received extra federal funding through the American Rescue Plan Act. In FY2019, before the pandemic, Florida's administrative cost was almost \$100 million less at \$178 million. This cost was divided equally between the federal and state governments.

The FNS provides oversight to state activities by measuring four quality control indicators: (1) SNAP payment error rate; (2) the timeliness of application processing; (3) program accessibility; and (4) case and procedural error rates (CAPERs). In the most recent year with data, the SNAP payment error rate was above 15 percent, mostly due to overpaying SNAP recipients. Florida's application processing rate was 64.38 percent, one of the lowest rates nationwide (47th). Florida scored 86 percent on the Program Accessibility Index, which is middling compared to other states. The state's case and procedural error rate (CAPER) was 54.99 percent, which is higher than the national CAPER of 43.81 percent and results in Florida earning one of the lowest ranks nationwide (42nd).

The OBBB Act resulted in the following changes to SNAP:

- Limited the USDA's ability to unilaterally change SNAP benefits by re-evaluating the Thrifty Food Plan and associated allotments;
- Removed and amended certain exemptions from the General Work Requirement;
- Created a tiered matching fund requirement for SNAP benefits that, for the first time, could require a state with a SNAP payment error rate higher than six percent to pay a portion of the SNAP benefits cost;
- Increased the state share of administrative costs from 50 percent to 75 percent;
- Ended mandatory (automatic) federal funding for the Supplemental Nutrition Assistance Program Education (SNAP-Ed); and
- Amended the list of non-citizens eligible for SNAP benefits.

The new OBBB Act requirements will cause a dramatic increase in state spending on SNAP, especially if Florida does not reduce its SNAP payment error rate. Florida is now responsible for 75 percent of its administrative cost, and it will be obligated to pay up to 15 percent of SNAP food benefits if the state does not reduce its SNAP payment error rate. **If this policy were in effect in FY2023, the state would have paid more than \$1 billion in SNAP benefits and administrative costs.** These projected increases come at a particularly bad time. Although state budget estimators project a \$3.8 billion surplus for FY2027, deficits of -\$1.5 billion and -\$6.6 billion are projected for FY2028 and FY2029, respectively.

On January 31, 2025, President Trump issued Executive Order 14192, entitled "Unleashing Prosperity Through Deregulation." This order made it the policy of the executive branch to authorize greater flexibility in staffing arrangements for SNAP. Florida now has the opportunity to hire private contractors and non-profits to improve the administration of SNAP. Private contractors often have expertise, superior technology, greater staffing flexibility, and better risk management, all of which could enhance the quality of SNAP.

Without bringing in outside assistance, it is highly unlikely that the state of Florida can reduce the SNAP error rate to sufficient levels as to avoid significant financial penalties. Therefore, outsourcing this work will be money well spent.

FLORIDA TAXWATCH URGES THE STATE TO TAKE IMMEDIATE ACTION TO PROCURE A CONTRACTOR TO ASSIST IN REFORMING SNAP IN FLORIDA TO REDUCE PAYMENT ERROR RATES AND IMPLEMENT THE NEW FEDERAL SNAP WORK REQUIREMENTS TO AVOID PENALTIES.

INTRODUCTION

“It is hereby declared to be the policy of Congress, in order to promote the general welfare, that the Nation’s abundance of food should be utilized cooperatively by the States, the Federal Government, and local governmental units to the maximum extent practicable to safeguard the health and well-being of the Nation’s population and raise levels of nutrition among low-income households.”

– Public Law 88-525—August 31, 1964.

In 1964, Congress passed federal legislation, the Food Stamp Act, creating a general welfare network intended to provide low-income households with low-cost foods (although there were no nutritional restrictions on the food families could choose). Throughout the years, the program evolved, ultimately becoming the Supplemental Nutrition Assistance Program (SNAP) in 2008, after electronic benefits replaced paper food stamps. Participants in SNAP are able to buy groceries with funds uploaded to an Electronic Benefits Transfer (EBT) card, which works like a debit card. Participants can only use these funds to buy approved items, which varies by state. When the program was first conceived, the U.S. Department of

Agriculture (USDA) estimated four million people would enroll in the program.¹ In FY2024, SNAP served an average of 41.7 million participants per month.² In Florida, roughly one-in-eight residents relies upon SNAP benefits each month.³

In July 2025, President Trump signed the One Big Beautiful Bill Act of 2025 (the OBBB Act), changing the requirements for SNAP eligibility, benefits, and program administration. Once implemented, fewer people will be eligible for benefits and there will be fewer exemptions from work requirements. **THE STATES WILL BE RESPONSIBLE FOR TWICE AS LARGE A SHARE OF ADMINISTRATIVE COSTS AND WILL BEGIN TO PAY A MATCHING RATE FOR THE BENEFIT ALLOTMENT COSTS, BASED ON EACH STATE’S SNAP PAYMENT ERROR RATE.**

It should already be a priority for state leaders to operate this critical program with optimal efficiency. These new policy changes, however, set the stakes higher. Florida TaxWatch undertakes this independent research project to better understand how the upcoming changes in SNAP will impact Florida’s budget and its ability to provide much needed food assistance to needy Floridians.

Why SNAP’s Changes Matter for Florida

SNAP is a lifeline for roughly one in eight Floridians, helping low-income households put food on the table each month. The One Big Beautiful Bill Act of 2025 shifts far more of SNAP’s costs and risks onto the states, especially those with high payment error rates like Florida. Without major improvements in how SNAP is administered, Florida taxpayers could face more than \$1 billion a year in new benefit and administrative costs.

¹ United States Department of Agriculture, “A Short History of SNAP,” updated August 2025.

² United States Department of Agriculture, “Supplemental Nutrition Assistance Program (SNAP) – Key Statistics and Research,” July 2025.

³ Ibid.

SNAP IN THE UNITED STATES

~ BEFORE THE OBBA ACT ~

The Food and Nutrition Service (FNS), under the USDA, is responsible for administering SNAP. The FNS distributes SNAP funds to state agencies. State agencies determine eligibility, enroll participants, calculate benefits, and disburse benefits to participants. Before the OBBA Act, the FNS reimbursed 50 percent of administrative costs and 100 percent of SNAP benefit costs. The FNS also provides oversight functions to the state agencies, contracts with EBT companies, and maintains and oversees the network of retailers authorized to accept SNAP benefits.

SNAP only provides benefits to low-income individuals meeting certain eligibility criteria. A household is eligible for SNAP benefits if their income limit is less than or equal to 200 percent of the Federal Poverty Level. The household's assets must also fall below certain amounts. Households with a member who is aged 60 or older, or a member who has a disability, must have assets of \$4,500 or less. Households without such members must have assets of \$3,000 or less.⁴

Certain groups are ineligible for SNAP benefits, regardless of income level, including non-citizens without legal status, postsecondary students enrolled in college at least half time, and, in some states, individuals with a felony drug conviction. In addition to the standard criteria, non-citizens with legal status must have residency in the United States for at least five years, be receiving disability-related assistance, or be a child under 18 to be eligible for SNAP benefits.⁵ Households that receive another means-tested program, such as Supplemental Security Income (SSI) or Temporary Assistance for Needy Families (TANF), are categorically (automatically) eligible for SNAP with no eligibility determination.⁶

The Thrifty Food Plan is used to set the maximum SNAP benefit allotment. Designed by the USDA, the Thrifty Food Plan outlines a meal plan to maintain a healthy diet at home at a low cost. The USDA develops the Thrifty Food Plan with consideration to current food prices, food

composition data, consumption patterns, and dietary guidance. The groceries needed to sustain the Thrifty Food Plan are referred to as the "market basket."⁷ Using the market basket value as the basis, the amount of funds provided to each household is adjusted in accordance with its size and income (Table 1). When measuring a household's income, deductions are made for expenses important to the financial stability of the household, such as childcare expenses or medical expenses for elderly or disabled household members.

TABLE 1.
Benefits Received Vary Based on the Income and Household Size of Participants (2024)

People In Household	200% Gross Monthly Income Limits Effective 10/1/24	130% Gross Monthly Income Limits Effective 10/1/24	100% Net Monthly Income Limits Effective 10/1/24	Maximum Benefit Amount Effective 10/1/24
1	\$2,510	\$1,632	\$1,255	\$292
2	\$3,480	\$2,215	\$1,704	\$536
3	\$4,304	\$2,798	\$2,152	\$768
4	\$5,200	\$3,380	\$2,600	\$975
5	\$6,098	\$3,963	\$3,049	\$1,158
6	\$6,994	\$4,546	\$3,497	\$1,390
7	\$7,890	\$5,129	\$3,945	\$1,536
8	\$8,788	\$5,712	\$4,394	\$1,756
For Each Additional Person Add	+\$898	+\$583	+\$449	+\$220

Source: Florida Department of Children and Families, Food Assistance Program Fact Sheet

⁴ United States Department of Agriculture, Food and Nutrition Service, "SNAP Eligibility," retrieved from <https://www.fns.usda.gov/snap/recipient/eligibility>, accessed on November 18, 2025.

⁵ United States Department of Agriculture, "SNAP Eligibility: Frequently Asked Questions," retrieved from <https://www.fns.usda.gov/snap/recipient/eligibility>, accessed on October 31, 2025.

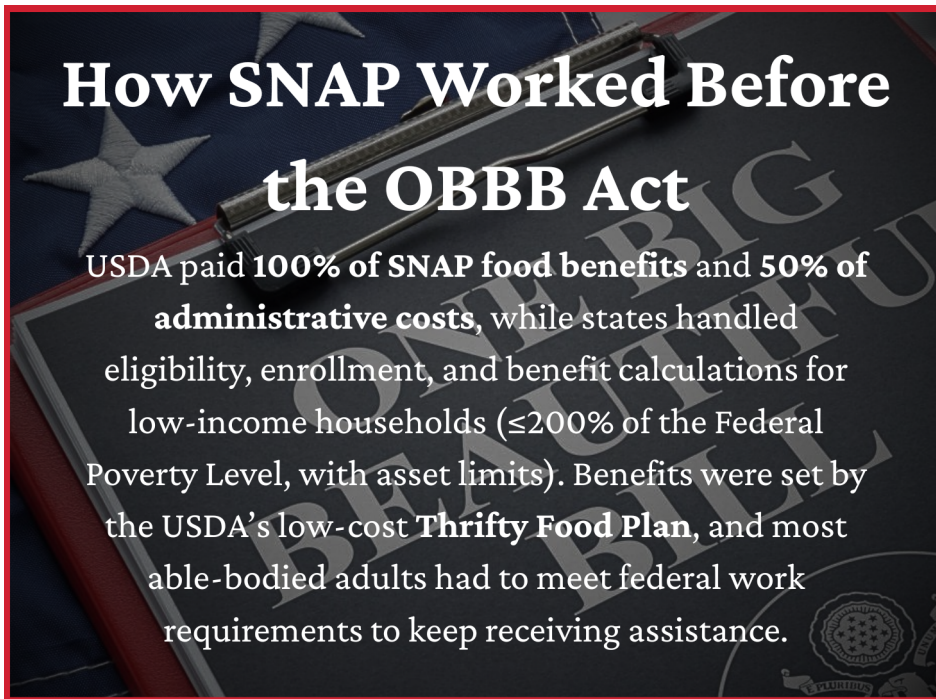
⁶ United States Department of Agriculture, Food and Nutrition Service, State Options Report, 2024.

⁷ United States Department of Agriculture, Food and Nutrition Service, "USDA Food Plans."



To maintain access to SNAP benefits, able-bodied adults must meet the General Work Requirement. The General Work Requirement requires individuals aged 16 to 59 to register for work, participate in the SNAP Employment Training Program, or work a job at least 30 hours a week. Exemptions exist for people who are unable to work, are caring for young children or incapacitated people, or are enrolled as a student.⁸

Able-bodied adults without dependents (ABAWDs) aged 18 to 54 must meet the General Work Requirement and the additional work requirement to receive SNAP benefits for more than the initial three months. The additional requirements may be satisfied by working at least 80 hours per month (paid or unpaid), participating in a work program for at least 80 hours per month, or a combination of the two. Before the OBBB Act, exemptions existed for physical or mental limitations, pregnancy, presence of a child in the household, veteran status, experiencing homelessness, or aging out of the foster care system.



⁸ United States Department of Agriculture, "SNAP Work Requirements," retrieved from <https://www.fns.usda.gov/snap/workrequirements>, accessed on October 31, 2025.

⁹ Transparency Florida, Operating Budget – State Positions, FY2025-26.

¹⁰ Florida Department of Children and Families, Long Range Program Plan Fiscal Years 2024-2025 through 2028-2029, September 2023.

SNAP IN FLORIDA

ADMINISTRATION

States can choose whether SNAP is administered by the state or its regions, districts, or counties. The chosen entity is responsible for rulemaking, certifying eligible applicants for enrollment, and disbursing funds. In Florida, SNAP is administered by the Office of Economic Self-Sufficiency (ESS), housed within the Department of Children and Families (DCF).

The ESS administers SNAP in tandem with other public assistance programs, including the Temporary Cash Assistance program, Medicaid, and School Readiness program. In FY2023, the ESS received more than 13 million applications requesting aid from one or more of these public assistance programs. In FY2025, the ESS has approximately 4,180 positions across the state, collectively receiving \$267 million in salaries and benefits.⁹ When reviewing all ESS operations, the administrative cost is 5.46 percent of the total cost of public assistance programs.¹⁰

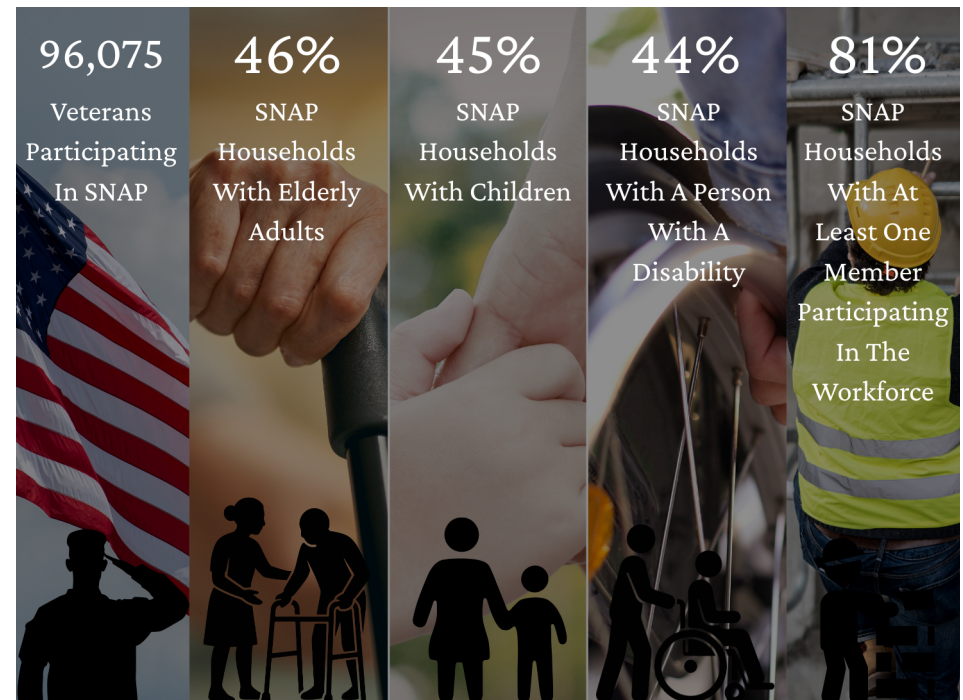
ELIGIBILITY AND BENEFITS

The federal government allows states to tailor their eligibility requirements and benefit allotment. Florida designed its SNAP program as follows:

- **Child Support Payments** — Florida has a deduction for income used to pay for child support.
- **Child Support Compliance** — If a custodial parent fails to cooperate with child support enforcement agencies, they become disqualified for SNAP benefits.
- **Comparable Disqualifications** — States can choose to disqualify SNAP participants who failed to satisfy actions required for comparable public assistance programs. Florida does not use comparable disqualifications for certifying SNAP participants.

- **Discretionary Exemptions** — State agencies are able to provide a limited number of discretionary exemptions to extend the SNAP eligibility period for ABAWDs on a monthly basis. Florida is one of 26 states to opt out of the discretionary exemptions.
- **Felony Convictions** — Florida opted out of a provision that would deny eligibility based on a felony drug conviction. Florida still disqualifies, however, applicants with a felony conviction for drug trafficking.
- **Mandatory SNAP Employment and Training Programs** — Florida is one of nine states to mandate certain household members participate in SNAP Employment and Training Programs. Florida’s legislation requires participation in the training program for all ABAWD participants aged 18 to 59 who do not qualify for an exemption.¹¹
- **Presence of Ineligible Noncitizens** — When an ineligible noncitizen lives in a household of people who would otherwise be eligible for SNAP benefits, states can choose how heavily to consider the income level of the ineligible citizen. In Florida, all household income is considered, but only a prorated share of the ineligible citizen’s income and deductions are used in the benefit calculations.
- **Reporting** — In every state, SNAP participants are required to report their economic status to the state agency. Florida only requires simplified reporting from households receiving benefits, meaning the household must report changes in income periodically and when countable income rises above 130 percent of the federal poverty line, work hours for ABAWDs fall below 20 hours per week, or if the household receives a substantial increase in earnings from lottery or gambling winnings.
- **Unemployment Waiver** — Florida is one of 18 states that does not use the option to request a waiver for work requirements due to high unemployment rates (ten percent or higher).
- **Work Requirements** — If a member of the SNAP household fails to comply with the work requirements, the state can choose to disqualify the individual or the household. Florida is one of eight states that chose to disqualify the entire household.¹²

FIGURE 1.
FLORIDIANS USING SNAP BENEFITS



Source: American Community Survey 5-Year Estimates (2023)

With approval from the Secretary of the USDA, DCF can enact additional restrictions on benefit uses within the state. On August 4, 2025, the Secretary approved a state ban on the use of SNAP benefits on sodas, energy drinks, candy, or prepared desserts. The new rule comes into effect January 2026.¹³

¹¹ §414.455(2), Fla. Stat. (2025)

¹² Supra, see footnote 6.

¹³ United States Department of Agriculture, “Florida SNAP Food Restriction Waiver,” August 2025.

APPLICATION PROCESS

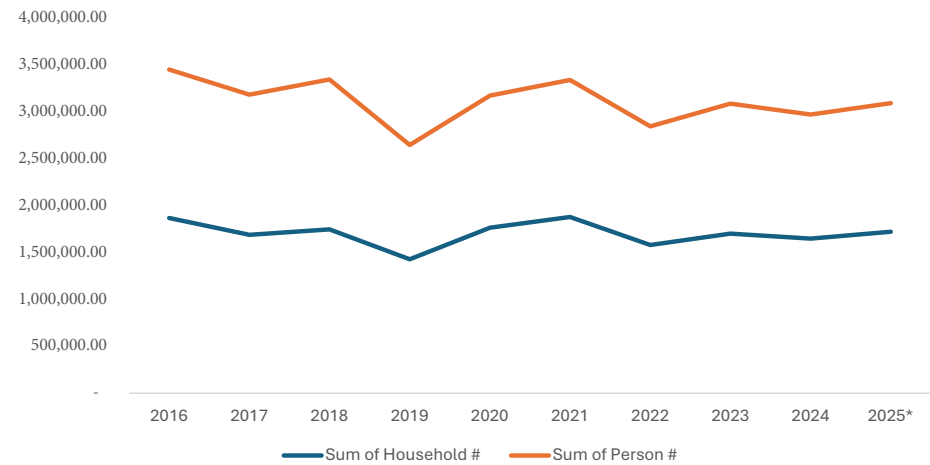
SNAP provides benefits to a diverse population of Floridians (Figure 1). To apply for SNAP benefits, an applicant can apply at a DCF Family Resource Center or online. To apply online, applicants may utilize computer resources at the offices of DCF community partners, such as food banks or community health centers. After the application is processed, applicants must submit proof of identity and proof of earned income. For some applicants, an interview may be required to clarify the household's situation and to verify an applicant's identity. Once approved, the SNAP participant receives an EBT card with a brochure outlining how the card may be used.

If the SNAP participant satisfies requirements, or is exempt from work requirements, they can receive benefits for up to three years. To maintain benefits during the three-year period, the SNAP participant must complete a periodic recertification process. Most households are required to recertify every six months, but some households recertify more frequently (households with unemployed adults and no dependents) and others recertify less frequently (households including a person with a disability). After the three year period, the SNAP participant can apply to rejoin SNAP.

NUMBER OF SNAP PARTICIPANTS

In FY 2025, Florida provided SNAP benefits to an average of 1.7 million households per month, supporting about 3.1 million Floridians (Figure 2). Over the past decade, SNAP participation levels have remained mostly steady, typically averaging between 1.5 million to 2.0 million households per month. Over the observed timeframe, SNAP witnessed its lowest participation level in 2019, serving an average of 1.4 million households. The following year, which coincided with the COVID-19 pandemic, participation levels spiked up to 1.8 million households.¹⁴

FIGURE 2.
OVER THE PAST DECADE, FLORIDA'S SNAP PARTICIPATION MOSTLY HOVERED BETWEEN 1.5 MILLION AND 2.0 MILLION HOUSEHOLDS PER MONTH



Source: United States Department of Agriculture, SNAP Data Tables

*FY2025 is based on months with available data (October 2024 – May 2025)

In July 2024, the Florida counties with the greatest number of SNAP participants were Miami-Dade County, Broward County, and Hillsborough County (Table 2). Counties with the largest number of SNAP participants are typically the counties with the largest population sizes.¹⁵ The counties with the highest dependency rates tend to be small, fiscally constrained counties, with as many as one in five residents relying upon SNAP benefits.¹⁶

¹⁴ United States Department of Agriculture, "SNAP Data Tables."

¹⁵ Ibid.

¹⁶ United States Department of Agriculture, "SNAP Data Tables," and the Florida Legislature's Office of Economic and Demographic Research, Population and Demographic Data Products—Florida. Florida TaxWatch divided the number of persons receiving SNAP in July 2024 by the number of persons living in each county in April 2024. This calculation is an estimate. Glades county did not have readily available SNAP data, excluding the county from the calculation. The counties with the highest dependency rate were Hendry County, Putnam County, Highlands County, Gadsden County, Taylor County, Miami-Dade County, Hardee County, Columbia County, Gilchrist County, and Levy County.

TABLE 2.
MIAMI-DADE COUNTY HAS THE GREATEST NUMBER OF HOUSEHOLDS
RELYING ON SNAP BENEFITS IN FLORIDA

Florida Count	People Using SNAP (July 2024)	Households Using Snap (July 2024)
Miami-Dade County	577,427	376,336
Broward County	252,859	144,948
Hillsborough County	226,192	120,805
Orange County	197,468	106,048
Palm Beach County	167,668	93,689
Duval County	152,255	77,978
Polk County	149,308	73,750
Pinellas County	90,807	54,243
Lee County	96,466	50,062
Volusia County	69,989	38,002

Source: United States Department of Agriculture, SNAP Data Tables

¹⁷ Supra, see footnote 2.

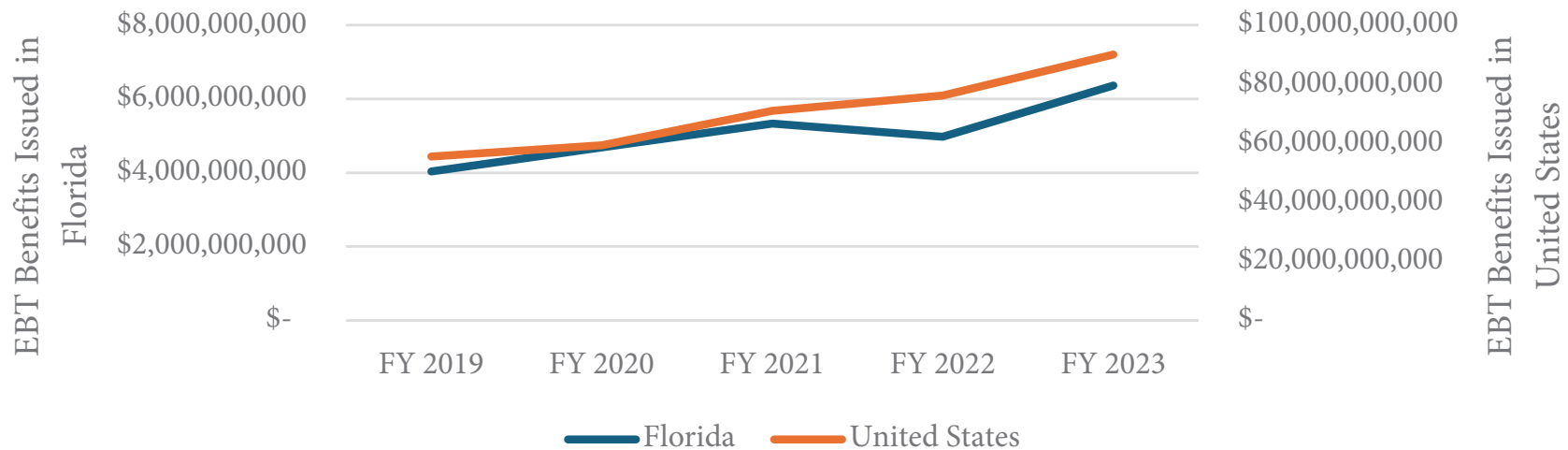
¹⁸ United States Department of Agriculture, Food and Nutrition Service, “State Activity Report FY 2023.”

Nationwide, Florida ranked 18th in SNAP reliance, with a participation rate of 12.7 percent. In FY2024, the national median SNAP participation rate was 11.2 percent, ranging from 4.8 percent in Utah to 21.2 percent in New Mexico.¹⁷

COSTS OF SNAP

Before the OBBB Act, the federal government covered 100 percent of SNAP benefit costs. In FY2023, the United States issued more than \$90 billion in SNAP benefits. In Florida, SNAP participants received more than \$6 billion of these issued SNAP benefits, and its average monthly benefit per person was \$191.06. The cost of SNAP benefits has grown significantly (Figure 3). From FY2019 to FY2023, the amount of funds disbursed grew by more than 50 percent. During the COVID-19 pandemic, states received extra funding to disburse as emergency allotments, but to keep the data comparable by year, the emergency allotments are not included in Figure 2.¹⁸

FIGURE 3.
FROM FY2019 TO FY2023, THE COST OF SNAP BENEFITS GREW BY MORE THAN 50 PERCENT



Source: United States Department of Agriculture, State Activity Reports (FY2019, FY2020, FY2021, FY2022, FY2023)



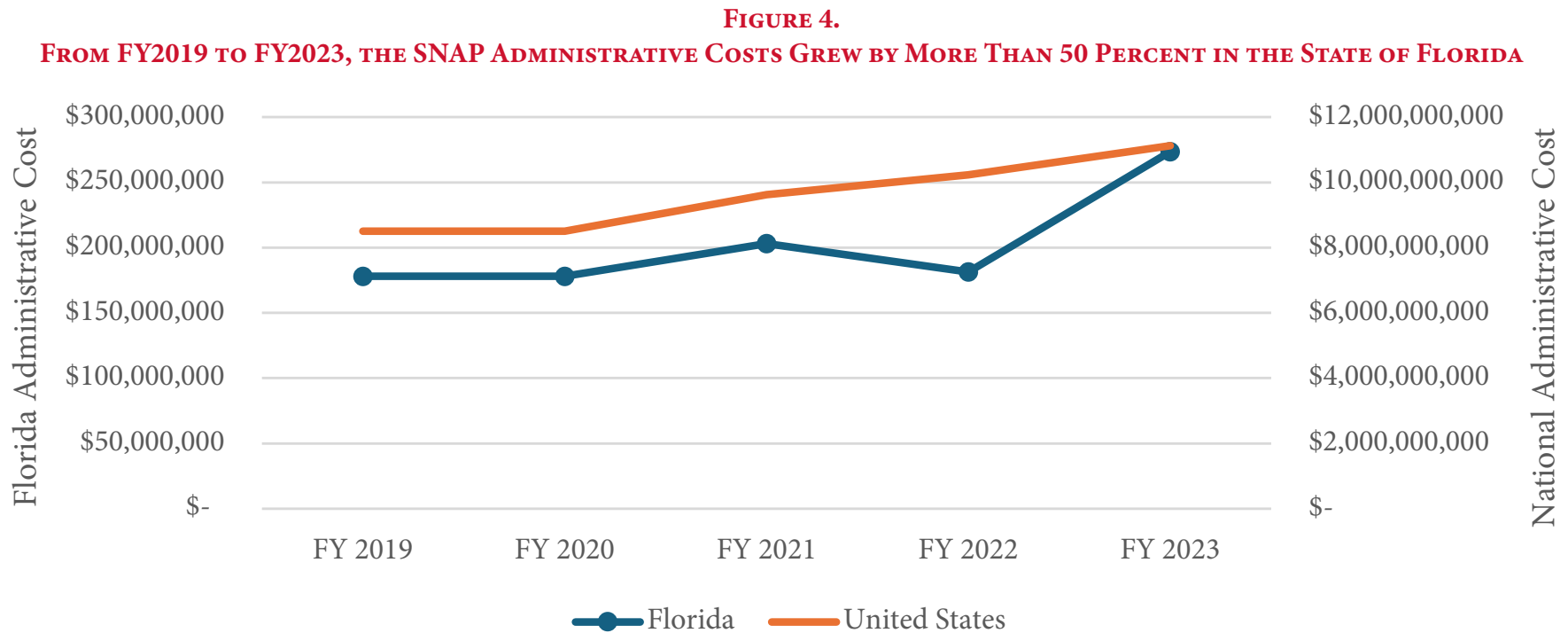
SNAP also bears an administrative cost, which includes all expenses related to the delivery of services to the eligible population. The administrative cost is shared by the state and federal government and, in a typical year, the FNS reimburses 50 percent of each state’s administrative cost. In response to the COVID-19 pandemic, the U.S. Congress passed a provision within the American Rescue Plan Act to further support administrative costs as states navigated heavier demand upon SNAP. From FY2021 through FY2023, the American Rescue Plan Act provided the State of Florida with additional funding to cover 100 percent of its administrative cost.

In FY2023, the total administrative cost nationwide grew to \$11.1 billion, a 13 percent increase from the year prior. In the same year, Florida’s total administrative cost was \$273 million. **Administrative costs grew more quickly in Florida than in the rest of the nation (Figure 4).**

From FY2019 to FY2023, the collective administrative cost for all the states grew by 30.8 percent, and Florida’s administrative cost grew by 53.5 percent. It should be noted, however, that the states were receiving extra administrative funds throughout this timeframe due to the COVID-19 pandemic.

The State of Florida has the smallest administrative cost per case per month in the nation, costing only \$13.63 per case per month.¹⁹ In comparison, the national administrative cost per case per month is \$41.62, with one state’s administrative cost per case per month reaching as high as \$104.75.²⁰

¹⁹ Supra, see footnote 18.
²⁰ Ibid.



Source: United States Department of Agriculture, State Activity Reports (FY 2019, FY 2020, FY 2021, FY 2022, FY 2023)

QUALITY OF SNAP

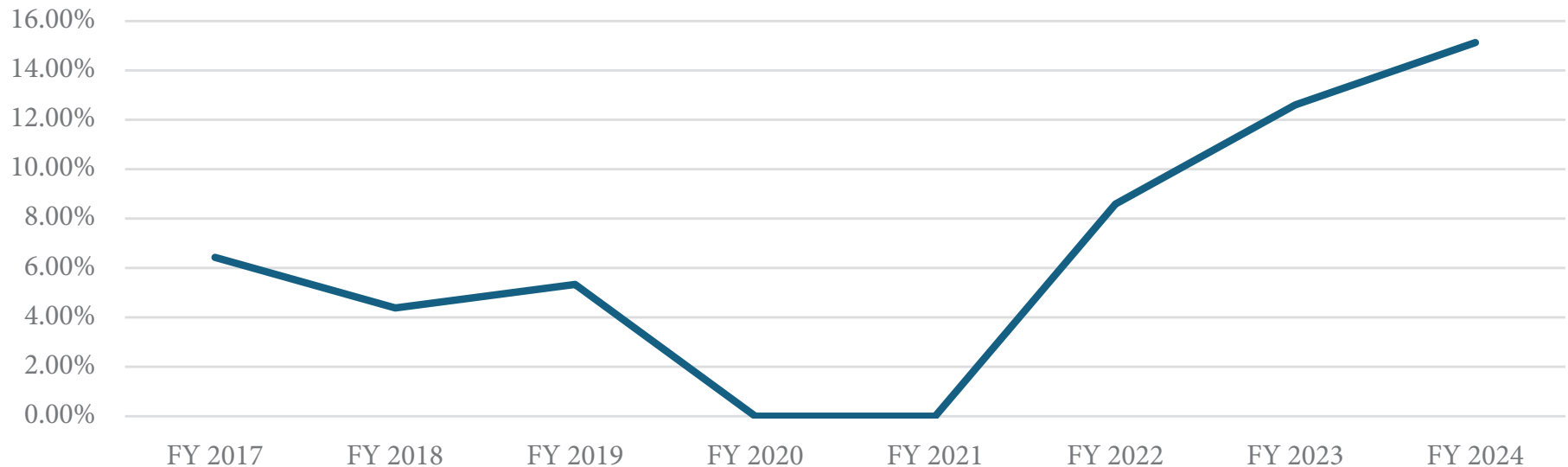
Under the guidance of the FNS, every state conducts a quality control process for SNAP. The review examines a statistically representative sample of SNAP participants, as well as a statistically representative sample of households with denied, terminated, or suspended benefits. This quality control process determines the SNAP payment error rate, the timeliness of application processing, program accessibility, and case and procedural error rates (CAPERs).²¹

The SNAP payment error rate is a comparable indicator used to monitor the extent with which a state overpays or underpays SNAP participants. Since the COVID-19 pandemic, Florida's SNAP payment error rate has steadily increased (Figure 5). Before the pandemic, Florida's SNAP payment error rate hovered around five percent. In FY2024, the SNAP payment error rate was above 15 percent, mostly due to overpaying SNAP recipients. The national SNAP payment error rate was 10.93 percent.²²

21 U.S. Government Accountability Office, Improper Payments: USDA's Oversight of the Supplemental Nutrition Assistance Program, September 2024.

22 United States Department of Agriculture, Food and Nutrition Service, "Supplemental Nutrition Assistance Program: Payment Error Rates Fiscal Year 2024."

FIGURE 5.
SINCE THE COVID-19 PANDEMIC, FLORIDA'S SNAP PAYMENT ERROR RATE CONTINUES TO RISE



Source: United States Department of Agriculture, Supplemental Nutrition Assistance Program: Payment Error Rates
FY2020 and FY2021 did not collect data due to the COVID-19 pandemic

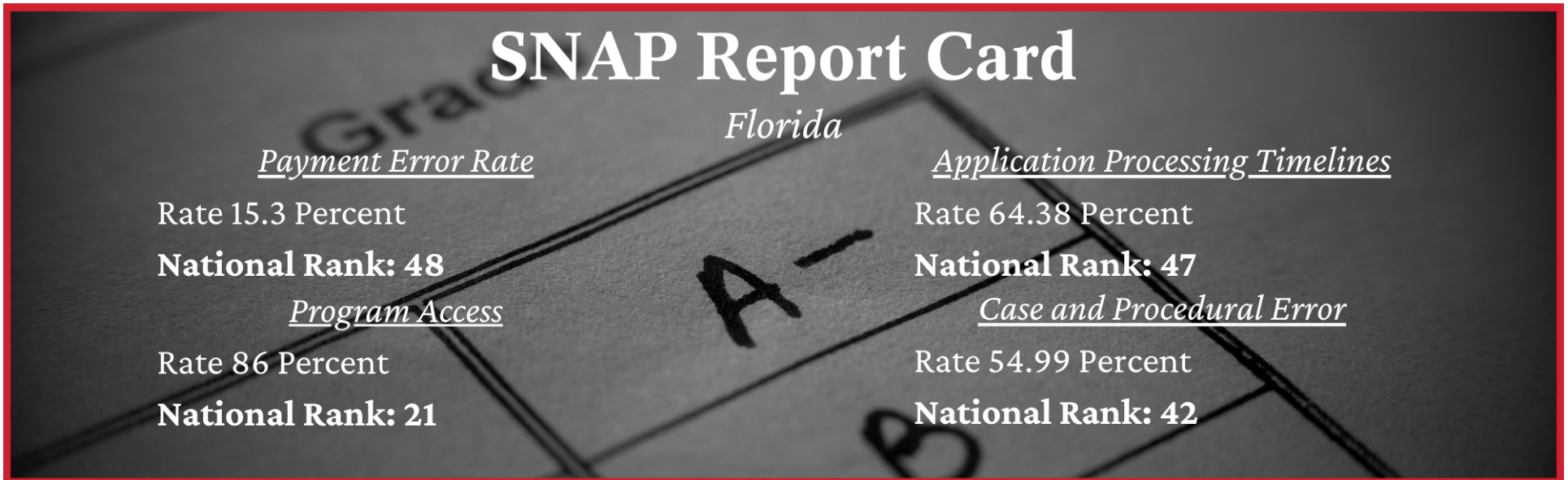
A study conducted by the U.S. Government Accountability Office (GAO) discovered that most errors are a result of unverified eligibility for program benefits. States' errors often derived from difficulties verifying an applicant's citizenship, education enrollment, employment status, financial status, household size, proof of identity, or residency. States with a SNAP payment error rate above six percent must develop and implement a corrective action plan, but the GAO study noted that some states have limited resources to perform the analysis needed to identify and remedy the cause of errors.²³

The FNS also monitors the timeliness with which applications are processed. The Food and Nutrition Act of 2008 requires that all eligible households receive SNAP benefits within 30 days of an application's submission. In FY2023, the ESS processed 45 percent of food assistance applications within seven days and 67 percent of food assistance applications within 30 days.²⁴

FLORIDA'S OVERALL TIMELINESS RATE (64.38) IS ONE OF THE LOWEST RATES NATIONWIDE.²⁵

The Program Access Index (PAI) is used to determine whether eligible individuals with incomes below 125 percent of the federal poverty line have access to SNAP benefits. In FY2023, Florida's PAI was 86 percent, an eight percentage point improvement from the prior year.²⁶

A Case and Procedural Error (CAPER) occurs when the administering agency denies, terminates, or suspends a household's SNAP benefits inaccurately or through incorrect procedures. Technical assistance and proper caseworker training are key to minimizing case and procedural errors. **IN FY2024, FLORIDA HAD A CAPER OF 54.99 PERCENT, WHICH IS HIGHER THAN THE NATIONWIDE CAPER (43.81 PERCENT).**²⁷



²³ U.S. Government Accountability Office, Improper Payments: USDA's Oversight of the Supplemental Nutrition Assistance Program, September 2024.

²⁴ Supra, see footnote 9.

²⁵ United States Department of Agriculture, Food and Nutrition Services, "FY 2023 Reported SNAP Application Processing Timeliness."

²⁶ United States Department of Agriculture, "SNAP Program Access Index."

²⁷ United States Department of Agriculture, "SNAP Case and Procedural Error Rates."

EFFECTS OF THE ONE BIG BEAUTIFUL BILL ACT

On July 4, 2025, President Trump signed the OBBB Act. The OBBB Act includes six sections influencing the eligibility and operations of SNAP.

SECTION 10101. RE-EVALUATION OF THRIFTY FOOD PLAN (EFFECTIVE IMMEDIATELY)

The OBBB Act limits the USDA’s ability to re-evaluate the Market Baskets for the Thrifty Food Plan. The USDA cannot re-evaluate the 2021 Market Basket until October 1, 2027, which is similar to the five-year frequency set by the 2018 Farm Bill. The bigger change set forth by this provision is that the USDA cannot increase the cost of the Thrifty Food Plan based on the periodic re-evaluation. The USDA may continue adjusting costs of the current Market Baskets, however, based on changes in the Consumer Price Index for All Urban Consumers. This policy change is intended to limit the cost growth of Market Baskets, and, thus, control the cost growth of SNAP benefits.

SECTION 10102. MODIFICATIONS TO SNAP WORK REQUIREMENTS FOR ABLE-BODIED ADULTS (EFFECTIVE IMMEDIATELY)

This provision of the OBBB Act amends, adds, and removes exemptions from the Additional Work Requirements needed to exceed the three-month time limit (Table 3). The purpose of this section is to further encourage SNAP participants to become self-sufficient. Mostly, the provision expands the groups of people subjected to the Additional Work Requirements.

**TABLE 3.
MODIFICATIONS TO THE SNAP WORK REQUIREMENTS FOR ABLE-BODIED ADULTS CHANGES THE POPULATIONS SUBJECTED TO THE ADDITIONAL WORK REQUIREMENTS**

Population	Number of ABAWDs Affected	Policy Change
Homeless Individuals	91,266	Removed exemption from Additional Work Requirement
Veterans	875	Removed exemption from Additional Work Requirement
Young Persons “Aged-Out” of Foster Care (18 to 24)	475	Removed exemption from Additional Work Requirement
Persons Aged 55 to 64	55,137	Removed exemption from Additional Work Requirement
Caregiver of an Older Minor (14 to 17)	33,464	Removed exemption from Additional Work Requirement
Indians, California Indians, and Urban Indians	Unknown	New Exemption

Source: State of Florida Department of Children and Families, Internal Memo—Title: 1267/OBBBA Presentation Follow-Up, n.d.

This section also changes the way the USDA can provide ABAWD waivers for high unemployment areas. Removing an exception for areas with a “lack of sufficient jobs,” the OBBB Act only allows continuous states to request a waiver for an area if their unemployment rate exceeds ten percent. None of Florida’s counties has an unemployment rate that exceeds ten percent, and even if they did, Florida has historically refrained from requesting the unemployment waiver. Ultimately, this change will have a minimal effect on Floridians.

SECTION 10105. MATCHING FUNDS REQUIREMENTS (EFFECTIVE FY2028)

Before the OBBB Act, the federal government covered all the costs for SNAP benefits. This section adds a new cost-share provision, incentivizing states to distribute payments with a higher level of accuracy to avoid paying higher shares of the cost. The matching funds rates are set as follows:

- States with a SNAP payment error rate less than six percent are responsible for 0 percent of the cost;
- States with a SNAP payment error rate between six percent and eight percent are responsible for five percent of the cost;
- States with a SNAP payment error rate between eight percent and ten percent are responsible for ten percent of the cost; and
- States with a SNAP payment error rate higher than ten percent (like Florida) are responsible for 15 percent of the cost.

The USDA shall use the SNAP payment error rate from the third fiscal year preceding the fiscal year for which the share is being calculated. If the state's SNAP payment error rate for FY2025 is higher than 20 percent when multiplied by 1.5, the implementation date will start in FY2029, providing the state with time to correct its failure to administer payments accurately.

In FY2024, the SNAP payment error rate was 15.13 percent in Florida. If Florida does not improve its SNAP payment error rate, the state will pay 15 percent of its benefit costs. Multiplied by 1.5, the SNAP payment error rate exceeds 20 percent, meaning if the current SNAP payment error rate stays the same in FY2025, the state will qualify for delayed implementation of the matching fund requirements. Qualifying for the delay underscores the severity of Florida's inaccurate payment distribution.

WITHOUT IMPROVEMENT, FLORIDA WILL BE REQUIRED TO USE ITS OWN TAXPAYER DOLLARS TO SHARE THE COST OF SNAP BENEFITS.

²⁸ Supra, see footnote 2.

²⁹ Supra, see footnote 21.

Table 4 considers how this policy would have affected Florida if it were already in place in FY2023, the most recent year with benefit issuance data. In FY2023, Florida issued \$6,362,366,910 worth of benefits²⁸ and had a SNAP payment error rate of 12.6 percent.²⁹ Based on this, Florida would pay \$954 million worth of benefits in this scenario. The table also calculates the lower costs if Florida's SNAP payment error rate were low enough to qualify for other tiers.

**TABLE 4.
IF THE MATCHING FUNDS POLICY EXISTED IN FY2023,
FLORIDA'S SHARE OF SNAP BENEFIT COSTS WOULD HAVE BEEN
\$954 MILLION**

SNAP Payment Error Rate	State Share of Benefits	State Cost
10 Percent or More	15%	\$954,355,037
8 to 10 Percent	10%	\$636,236,691
6 to 8 Percent	5%	\$318,118,346
Less than 6 Percent	0	0

SECTION 10106. ADMINISTRATIVE COST SHARING (EFFECTIVE FY 2026)

Prior to the new legislation, the federal government reimbursed 50 percent of the states' administrative costs. During the COVID-19 pandemic, emergency funds helped cover up to 100 percent of the states' administrative costs from FY2021 through FY2023. The OBBB Act will shift more of the cost burden to the states, with the states' share of costs growing from 50 percent to 75 percent. This change was implemented to further encourage the states to minimize the costs of running SNAP.

In FY2023, Florida's SNAP administrative cost was \$273 million. If this policy were in place in FY2023, the State of Florida would have been responsible for \$205 million, \$69 million more than if it were only responsible for 50 percent of administrative costs. It should be noted, however, that the state was still receiving extra federal funds from the American Rescue Plan Act, which provided extra administrative funding due to the COVID-19 pandemic.

SECTION 10107. NATIONAL EDUCATION AND OBESITY PREVENTION GRANT PROGRAM (EFFECTIVE IMMEDIATELY)

The Supplemental Nutrition Assistance Program Education (SNAP-Ed) is a federally funded grant program intended to teach SNAP participants how to make the most of their SNAP benefits. Through state and local organizations, SNAP-Ed operates programs that teach eligible individuals about nutrition, cooking healthy meals, and leading physically active lifestyles. The OBBB Act eliminates the mandatory federal funding for SNAP-Ed.

In Florida, the SNAP-Ed program is implemented by Feeding Florida and the University of Florida IFAS Extension Family Nutrition Program (Family Nutrition Program). The Family Nutrition Program started nearly 30 years ago and will close down due to this new policy. In FY2024, the Family Nutrition Program partnered with nearly 600 local organizations and taught programming to more than 270,000 youths. Closure of the program will eliminate 76 employee positions spread throughout 31 counties.³⁰

SECTION 10108. ALIEN SNAP ELIGIBILITY (EFFECTIVE IMMEDIATELY)

Before the OBBB Act, SNAP was accessible to any “qualified alien,” which included lawful permanent residents, refugees, asylees, aliens paroled into the United States, certain battered aliens, certain victims of human trafficking, Cuban-Haitian Entrants, and migrants lawfully residing in the United States pursuant to the Compact of Free Association. The OBBB Act limits eligibility, now only allowing lawful permanent residents, Cuban-Haitian Entrants, Indians, Urban Indians, Californian Indians, and migrants lawfully residing in the United States pursuant to the Compact of Free Association. Since data about the immigration status of SNAP participants is limited, the effect of this change on Florida is unknown.³¹

CONCLUSIONS AND RECOMMENDATIONS

The combined impact of the new OBBB Act requirements is expected to cause a significant increase in state spending on SNAP. For the first time in SNAP’s history, states with high payment error rates will have to pay for a portion of SNAP food benefits, in addition to administrative costs. Exactly how much a state must pay is tied to its payment error rate. States like Florida, with payment error rates above 10 percent, can be expected to pay up to 15 percent of SNAP food benefits. States will also be responsible for a larger share of administrative costs, growing from 50 percent to 75 percent. In addition, the year-to-year variability of payment error rates and enrollment numbers will create significant uncertainty, making it difficult for the state to plan and budget effectively. **ALL TOLD, THE IMPACT TO FLORIDA’S ANNUAL BUDGET WILL LIKELY EXCEED \$1 BILLION.**

These projected increases come at a particularly bad time. Although state budget estimators project a \$3.8 billion surplus for FY2027, deficits of -\$1.5 billion and -\$6.6 billion are projected for FY2028 and FY2029, respectively.³² Florida’s ability to reduce its SNAP payment error rate to six percent or below depends in large part on how accurately the state can process eligibility and benefit determinations. In response to requests for guidance regarding compliance with the federal Intergovernmental Personnel Act of 1970 (IPA) and its implementing regulations, the federal Office of Personnel Management (OPM) maintained until late in the first Trump administration that state and local government agencies that receive Federal grants are limited to utilizing state and local government (merit system) personnel in the administration of these programs. The Biden administration restored the long-standing policy that limits certain responsibilities to merit personnel, but the second Trump administration has reinstated their policy from the first term.

This requirement created enormous problems during the COVID-19 pandemic. In November 2020, Florida TaxWatch published the report, “*After COVID-19: Rethinking How the State Delivers Services to Floridians in Need.*” This report outlines how the increased demand imposed by the COVID-19 pandemic exposed numerous shortcomings

30 University of Florida, “Honoring 30 Years of Impact: UF/IFAS Extension Family Nutrition Program to Close,” retrieved from <https://blogs.ifas.ufl.edu/news/2025/09/09/honoring-30-years-of-impact-uf-ifas-extension-family-nutrition-program-to-close/>, accessed on November 5, 2025.

31 Congressional Research Service, Supplemental Nutrition Assistance Program (SNAP) and Related Nutrition Programs in P.L. 119-21: An Overview, July 2025.

32 Legislative Office of Economic and Demographic Research, “State of Florida Financial Outlook: Fiscal Years 2026-27 Through 2028-29,” September 12, 2025.

in the state's administration of federal safety net programs using merit system personnel. Florida TaxWatch observed the following benefits private contractors provided to Reemployment Assistance claims during the COVID-19 pandemic:

- Private contractors often hire high-performing employees from federal agencies. These employees have specialized knowledge and experience managing federal needs-based programs, such as SNAP;
- Private contractors have access to superior technology that can aid the efficiency of government service portals;
- Private contractors have the staffing flexibility to scale up or down. Many contractors have the capacity to bring in additional trained staff when needed to process claims and applications on a 24-hour per day seven days per week basis to reduce or eliminate backlogs; and
- Private contractors take a share of the risk, and usually, they are able to better manage risk with their competent workers and best-of-breed technology.

Fortunately, on January 31, 2025, President Trump issued [Executive Order 14192](#) entitled “Unleashing Prosperity Through Deregulation.” This order made it the policy of the executive branch to “alleviate unnecessary regulatory burdens placed on the American people” and authorized greater flexibility in staffing arrangements for SNAP and other federal programs, including the use of contractors to administer SNAP at the state level.³³

When properly procured and with proper oversight, contracted experts can provide the flexibility, competence, and technology needed to improve the delivery of public services. Furthermore, outsourcing a business process, such as eligibility determinations, appeals, and administering work requirements, has the potential to increase the efficiency of state government, which, in turn, could help reduce the size of government, save taxpayer money, and improve the delivery of services to Floridians who need it most.

Without bringing in outside assistance, it is highly unlikely that the state of Florida can reduce the SNAP error rate to sufficient levels as to avoid significant financial penalties. Therefore, outsourcing this work will be money well spent.

FLORIDA TAXWATCH URGES THE STATE TO TAKE IMMEDIATE ACTION TO PROCURE A CONTRACTOR TO ASSIST IN REFORMING SNAP IN FLORIDA TO REDUCE PAYMENT ERROR RATES AND IMPLEMENT THE NEW FEDERAL SNAP WORK REQUIREMENTS TO AVOID PENALTIES.

³³ See at [84 FR 16381](#) (April 19, 2019).

ABOUT FLORIDA TAXWATCH

As an independent, nonpartisan, nonprofit taxpayer research institute and government watchdog, it is the mission of Florida TaxWatch to provide the taxpayers of Florida and public officials with high quality, independent research and analysis of issues related to state and local government taxation, expenditures, policies, and programs. Florida TaxWatch works to improve the productivity and accountability of Florida government. Its research recommends productivity enhancements and explains the statewide impact of fiscal and economic policies and practices on citizens and businesses.

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The Hon. Jeff Kottkamp	Executive Vice President & General Counsel
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Piyush Patel	Immediate Past Chairman

RESEARCH PROJECT TEAM

Meg Cannan

Azariah Clemons

Senior Research Analyst | Lead Author

Media Specialist | Layout & Design

All Florida TaxWatch research is done under the direction of Dominic M. Calabro, President, CEO, Publisher & Editor.

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106 N. Bronough St
Tallahassee, FL 32301

o: 850.222.5052

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Have a Research Inquiry?

Contact Jeff Kottkamp at jkottkamp@floridataxwatch.org