November 16, 2026

The Honorable Brooke L. Rollins
Secretary
U.S. Department of Agriculture
1400 Independence Avenue SW
Washington, DC 20250

Re: Request for Extension of Comment Period, Supplemental Nutrition Assistance Program: Reforming Categorical Eligibility, Docket No. FNA-2026-0661, RIN 0584-AF10

Dear Secretary Rollins:

On behalf of the undersigned national organizations representing state and local governments and the public officials responsible for administering critical human services programs, we respectfully request that the U.S. Department of Agriculture (USDA) extend the comment period for the proposed rule, Supplemental Nutrition Assistance Program: Reforming Categorical Eligibility, by 60 days, providing a total comment period of 90 days.

As USDA's intergovernmental partners in administering the Supplemental Nutrition Assistance Program (SNAP), our members will be directly responsible for implementing many of the significant policy, systems, staffing, training, and operational changes resulting from this proposal. A 30-day comment period—especially one that overlaps with the Thanksgiving holiday—does not provide sufficient time for state and local governments to fully evaluate the programmatic, administrative and fiscal impact of the proposal; consult with program administrators, analyze available data, and provide USDA with meaningful feedback.

The proposal would significantly change SNAP eligibility policy. By substantially narrowing the circumstances under which Temporary Assistance for Needy Families (TANF) benefits and services may confer categorical eligibility for SNAP, the rule would require states to apply SNAP's regular income and resource tests to millions of additional households. USDA's own estimates

indicate that, once fully implemented, approximately 3.2 million households containing 6.3 million individuals would lose SNAP benefits.

The administrative implications are equally significant. States and localities may need to modify eligibility systems, revise applications and notices, reinstate resource-verification procedures, train eligibility workers, and communicate new requirements to millions of applicants and participants. The proposal also asks states to provide detailed feedback on systems modifications, resource verification, administrative costs, and potential alternative approaches. Developing informed responses to these questions requires consultation with state and local program officials, information technology staff, eligibility workers, fiscal experts, state budget officials and policymakers responsible for overseeing and funding program administration. States also need adequate time to assess whether implementation would require additional appropriations, statutory changes or other legislative action.

Importantly, this work comes at a time when state and local human services agencies are already undertaking substantial changes to SNAP and other safety-net programs required by the *One Big Beautiful Bill Act* (Public Law 119-21). Implementing those statutory changes requires significant policy development, systems modifications, training, operational planning, participant communications and state fiscal planning. State legislatures and executive agencies are simultaneously assessing implementation responsibilities, budgetary impacts and any necessary statutory or appropriations changes associated with these federal requirements. The same state and local staff and resources responsible for that work must now evaluate the operational and fiscal consequences of this proposed rule. Providing additional time would allow agencies to assess how these overlapping changes interact and provide USDA with more accurate information about implementation timelines, costs, and potential unintended consequences.

Given the magnitude of the proposed changes and the critical role of state and local agencies in administering SNAP, a 90-day comment period is both reasonable and necessary. Additional time will strengthen the administrative record and provide USDA with more complete, data-informed feedback from state and local governments responsible for implementing, funding and overseeing SNAP administration. It will also allow state policymakers to assess potential budgetary and legislative implications before implementation decisions are finalized.

State and local governments are not merely stakeholders in this rulemaking, they are the governmental partners responsible for translating federal SNAP requirements into operational policy. Providing sufficient time for state and local governments to evaluate these consequences will help ensure that USDA has a complete understanding of the proposal's fiscal and operational effects before issuing a final rule.

We therefore respectfully request that USDA extend the comment period by 60 days, providing a total of 90 days for public comment. We appreciate USDA's consideration of this request and look forward to continuing to work together to ensure effective administration of SNAP.

Sincerely,

Reggie Bicha
President & CEO
American Public Human Services Association

Tim Storey
Chief Executive Officer
National Conference of State Legislatures

Matthew D. Chase
CEO/Executive Director
National Association of Counties

Tom Cochran
CEO and Executive Director
U.S. Conference of Mayors

Debbie Ann Anderson
President
National Association of County Human Services Administrators

Clarence E. Anthony
CEO & Executive Director
National League of Cities

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Tom Cochran
CEO and Executive Director
U.S. Conference of Mayors