Nov. 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, Modification to Work Requirements for Able-Bodied Adults, Docket No. FNA-2025-0368, RIN 0584-AF09

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 extend the comment period for the proposed rule, *Modification to Work Requirements for Able-Bodied Adults*, by 60 days, providing a total comment period of 90 days.

As USDA's partners in administering the Supplemental Nutrition Assistance Program, our members will be directly responsible for implementing the policy, systems, staffing, training, eligibility, and operational changes associated with this rule. The current 30-day comment period, which includes the Thanksgiving holiday and ends December 10, does not give state and local governments sufficient time to analyze the proposal, consult with program administrators and other state officials, evaluate administrative and fiscal impacts, and provide meaningful, data-informed comments.

The proposal addresses a particularly complex area of SNAP administration. It would codify significant statutory changes enacted by the One Big Beautiful Bill Act of 2025, including changes to the population subject to the SNAP time limit and the criteria for geographic waivers. At the same time, USDA proposes additional discretionary policy changes affecting waiver data requirements, the geographic areas that may qualify for waivers, and the definition of a "homeless individual." These overlapping statutory and regulatory changes require careful analysis to distinguish requirements fixed by federal law

from implementation choices on which state and local governments can provide meaningful input.

The proposal also presents significant operational questions for state agencies. The statutory changes expand the time limit to adults through age 64, change the age of a dependent child linked to an exception from under 18 to under 14, remove previous exceptions for veterans, individuals experiencing homelessness, and certain former foster youth, and establish new exceptions for certain American Indian and Alaska Native individuals. The rule also addresses the interaction between SNAP's general work requirements and the time limit, including the distinct treatment of adults ages 60 through 64. Assessing how these provisions interact with existing eligibility processes requires consultation among state policy staff, eligibility system administrators, frontline workers, legal counsel, program integrity officials, and information technology teams.

The proposed changes to geographic waivers similarly warrant careful state and local review. In addition to implementing the statutory change to waiver eligibility, USDA proposes to revise the data states may use to demonstrate qualifying unemployment rates, generally requiring recent 12-month unemployment data from the Bureau of Labor Statistics or a cooperating agency, with separate standards for exceptional circumstances and areas with limited data.

USDA also proposes to redefine the geographic units states may use for waiver requests, including counties, county equivalents, reservation areas, U.S. territories, and commuting zones, and to limit states' ability to group areas to demonstrate waiver eligibility. USDA notes that the recently updated commuting-zone methodology divides 3,144 counties and county equivalents into 588 labor-market areas. States need time to evaluate labor-market data, existing waiver practices, administrative processes, and local circumstances before providing informed feedback.

Importantly, states and localities must evaluate this proposal while already implementing substantial SNAP changes required by Public Law 119-21, including policy development, eligibility-system modifications, worker training, participant communications, and fiscal analysis. The same personnel must now assess how this proposed rule would affect eligibility determinations, time-limit tracking, waiver requests, notices, systems, staffing, and program administration.

The timing also presents practical challenges for intergovernmental consultation. Many state legislatures, governors' offices, and state agencies are preparing for upcoming legislative sessions and budget cycles, and state policymakers need sufficient opportunity

to consult with administering agencies and assess whether the proposal may require appropriations, statutory changes, systems investments, or other legislative action.

Given the breadth and technical nature of the proposal, a 90-day comment period would allow state and local governments to provide more complete, data-informed feedback. A fuller record will support more effective implementation of the final rule.

We therefore respectfully request that USDA extend the comment period by 60 days. We appreciate USDA's consideration of this request and look forward to continuing to work together to support effective administration of SNAP.

Sincerely,



Reggie Bicha
President & CEO
American Public Human Services Association



Tim Storey
Chief Executive Officer
National Conference of State Legislatures



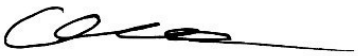
Matthew D. Chase
CEO/Executive Director
National Association of Counties



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