



**Maryland Hunger Solutions**

*Ending hunger and promoting well-being*

March 10, 2026

**TESTIMONY FOR HB 1318**

**Department of Human Services – Supplemental Nutrition Assistance Program  
– Error Reduction  
Unfavorable**

*House Appropriations Committee*

Dear Chair Barnes, Vice-Chair Kaiser, and Members of the Appropriations Committee, We are Maryland Hunger Solutions, a statewide, nonpartisan, nonprofit organization working to end hunger, improve nutrition and promote the wellbeing of Marylanders by maximizing participation in federal nutrition programs, addressing root causes of hunger and advocating for permanent solutions upending hunger and poverty statewide. We strive to overcome existing barriers to state and federal nutrition assistance programs and create self-sustaining connections for low-income Maryland residents experiencing food insecurity.

Maryland Hunger Solutions conducts robust Supplemental Nutrition Assistance Program (SNAP) outreach across the state providing direct application assistance to any Marylander seeking to apply for SNAP, offering one-on-one support to complete applications, gathering required documentation, troubleshoot case issues, and navigate recertification. Our goal is to reduce barriers to enrollment and help ensure individuals and families can access the food assistance they need in a timely manner.

HB 1318 would require that the Department of Human Services (DHS) develop a comprehensive plan to reduce the SNAP Payment Error Rate (PER). While reducing payment errors is an important federal requirement, this bill raises several concerns which are outlined below.

HB 1318 does not reference a specific, detailed plan aimed at reducing the state's payment error rate. The bill offers no guidance on what strategies DHS is expected to adopt, and what reporting metrics will be needed to measure the success of this bill. There also lacks acknowledgement of the technological, administrative, and staffing investments that will be required to support DHS in a time when they are already facing increased administrative burdens because of the 2025 Budget Reconciliation Act (H.R. 1). The legislature must first understand the needs of DHS to offer the support and resources needed to effectively process cases with minimal payment errors.

Recent federal policy changes impose the largest structural changes and benefit cuts in SNAP's history, adversely affecting thousands of Maryland residents. HB 1318 does not acknowledge that the



## Maryland Hunger Solutions

*Ending hunger and promoting well-being*

federal changes under H.R. 1 will likely increase the payment error rate due to the increased volume and complexity of the required documentation the federal government now requires. This bill attempts to create an additional check on DHS that would likely result in an increased number of payment errors. [Research](#) demonstrates that additional administrative complexity directly causes payment errors, and adding a new state-specific plan or documentation requirements will increase complexity.<sup>1</sup> Maryland will be subject to an administrative crisis if an additional layer of oversight is added.

Maryland is approaching a hunger cliff driven by the implementation of H.R. 1. Implementing the new federal policy means that thousands of households will face a reduction in benefits or fall off the program entirely. Reapplications will increase, and people will experience interruptions in benefits. The populations most impacted by these changes are older adults, people with disabilities, and previously qualified immigrants and mixed immigration status families. As DHS navigates these changes and implementation, the likelihood of payment errors dramatically increases. Creating an additional state-level administrative step when DHS is already navigating the largest SNAP cuts in history will exacerbate Maryland's food insecurity crisis.

DHS is already asked to comply with the U.S. Department of Agriculture (USDA) Quality Control (QC) audit that requires states to measure and report payment errors annually. High error rates already trigger a Corrective Action Plan that states must implement to bring error rates down.

To decrease the payment error rate, DHS has already implemented strategies designed to improve case accuracy and address the root cause of administrative errors. In 2025, DHS launched the OneApp, a mobile-friendly platform aimed to simplify access to public assistance and allow individuals to apply for multiple programs simultaneously. Further, effective January 2026, DHS implemented an automated process in which the Maryland Benefit Reviews (MBRs) or Simplified Reporting, will be automatically processed for cases in which no changes have occurred. The only MBRs that will be routed to a case manager are those where a change is reported. This will decrease caseworker error and simplify the process. Recipients with no changes will be notified that they will continue to receive their benefits for the remainder of their certification period.

DHS also meets monthly with Community-Based Organizations (CBOs) like Maryland Hunger Solutions. CBOs act as critical partners to improving case accuracy. Through our direct SNAP

---

<sup>1</sup> Plata-Nino, Gina. (2025). "Shifting the Burden: How the Recently Passed Budget Reconciliation Package Reshapes SNAP and Strains State Budgets." Food Research & Action Center (FRAC). Available at: <https://frac.org/blog/shifting-the-burden-how-the-recently-passed-budget-reconciliation-package-reshapes-snap-and-strains-state-budgets>.



## **Maryland Hunger Solutions**

*Ending hunger and promoting well-being*

application assistance, we work closely with clients to ensure applications are complete, required documentation is submitted accurately and timely, household information is clearly reported, and changes are properly communicated to DHS. By helping applicants navigate these complex eligibility rules and reporting requirements, CBOs are proactively preventing errors before cases are ever reviewed by a caseworker.

Additionally, HB 1318 does not address the funding and staffing that is needed for DHS to take on this added responsibility. Reducing the payment error rate at the level required by the bill would require more staff time, training, and potentially technology upgrades. Without adequate resources, DHS would likely be forced to divert limited resources away from case processing and client services to comply with another layer of oversight.

We remain committed to working collaboratively with DHS and the General Assembly to strengthen program integrity and ensure that eligible Marylanders can access SNAP without unnecessary barriers. For these reasons, Maryland Hunger Solutions respectfully requests an unfavorable report on HB 1318.