



House of Representatives

MARVIN LIM
REPRESENTATIVE, DISTRICT 98
P.O. BOX 931886
NORCROSS, GEORGIA 30093
AFFAIRS
(404) 656-0314 (OFFICE)
(404) 585-7715 (MOBILE)
(404) 651-8086 (FAX)
EMAIL: marvin.lim@house.ga.gov

COVERDELL LEGISLATIVE OFFICE BUILDING, ROOM 611-B
ATLANTA, GEORGIA 30334

STANDING
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AGRICULTURE & CONSUMER

APPROPRIATIONS
HEALTH
RETIREMENT

September 1, 2026

John Hallman
Deputy Commissioner for Family Independence
Georgia Department of Human Services
47 Trinity Avenue SW
Atlanta, GA 30334

Re: SNAP Recommendations

Dear Deputy Commissioner Hallman:

SNAP Recommendations

Thank you again for the General Assembly report, the work behind it, and the additional DHS/DFCS data after our conversations. I have extensively studied the information you have provided, and it has helped me understand how DHS is responding to the FY27 Georgia budget reporting requirement and the federal SNAP changes. We know Georgia needs to reduce its **15.21% payment error rate (PER)**; we should also reduce actual fraud without making it harder for eligible people to get or keep SNAP.¹

With that, I wanted to follow up with specific recommendations:

1. Track denials, closures, and churn alongside PER

PER measures whether eligibility and benefit amounts were correct for households that received SNAP. **CAPER, the Case and Procedural Error Rate**, measures whether denials, terminations, and suspensions were correct and whether DHS followed the required procedures. States already review a federal negative-case sample for CAPER using FNS-245. CAPER is already part of federal SNAP quality control.²

¹ Georgia DHS/DFCS, Georgia's Supplemental Nutrition Assistance Program Payment Error Rate Corrective Action Plan, HB 974 – Budget Line Item 2556, pp. 1–2; DHS correspondence and follow-up data provided July–August 2026.

² USDA Food and Nutrition Service, SNAP Case and Procedural Error Rates (CAPER); FNS-245, SNAP Negative Case Action Review Schedule. Federal SNAP QC requires review of active and negative samples; CAPER covers denials, terminations, suspensions, procedural accuracy, notice, and timeliness.

DHS says Georgia's PER is based on about 80–100 sampled cases out of roughly 700,000 cases. Gateway also lets DHS see what is happening across the much larger actual caseload.³

DHS's FFY 2025 error sheet is another reason to look beyond one number. In the sampled PER errors, agency error accounted for 100% of Missing Reports errors (DHS accepted a missing or incomplete required report), 92.6% of Shelter Deduction errors (DHS failed to verify the required shelter expense), 74.82% of Household Composition errors (DHS failed to follow up on or use reported household information), 100% of Time Limited Participation errors, 100% of Expired Certification Period errors, 100% of Medical Deduction errors, 100% of Student Eligibility errors, and 88.48% of Child Support Income errors. Wages and Salaries, the largest error-dollar category at \$16,997, was almost evenly split: 48.07% agency error and 51.93% client error. **These percentages describe the causes of sampled PER errors in each category; they are not percentages of all SNAP cases.**⁴

Because PER can reflect overpayments, underpayments, agency mistakes, and client mistakes, I would track these separately. I want to reduce PER without wrongly denying eligible people or adding work that does not improve accuracy.

DHS should report alongside PER:

- **CAPER, statewide and by district;**
- application approval and denial rates tied to denial reasons;
- **termination and closure reasons, including the percentage that are procedural rather than based on actual ineligibility;**
- **renewal completion rate and churn — the percentage of terminated households that return within 30, 60, or 90 days;**
- application processing timeliness, including expedited SNAP, and cases beyond the federal 7- and 30-day standards;
- **underpayment and overpayment rates and dollars separately;** and
- erroneous denials and terminations found through quality control.

Many of these measures are already tracked. CAPER and erroneous negative-case actions are already part of federal SNAP quality control,⁵ and DHS already tracks much of the application and case-processing data. What is missing is partly how the data are reported and partly specific measures I asked DHS for but did not receive. In my August 3 follow-up, I specifically identified procedural closures, churn at 30, 60, and 90 days, average processing time, and renewal completion rate as data that had not been provided. I would report the existing measures together with PER; add those missing measures; and add useful breakdowns that are not apparent in what

³ Georgia DHS/DFCS Corrective Action Plan, p. 2 (PER based on a sample of 80–100 cases from an approximately 700,000-case population).

⁴ Georgia DHS/DFCS, FFY 2025 Top Ten Error Descriptions: Missing Reports (100% agency); Shelter Deduction (92.60% agency); Household Composition (74.82% agency); Time Limited Participation (100% agency); Expired Certification Period (100% agency); Medical Deduction (100% agency); Student Eligibility (100% agency); Child Support Income (88.48% agency); Wages and Salaries (\$16,997 total error dollars; 48.07% agency / 51.93% client).

⁵ USDA Food and Nutrition Service, SNAP Efficiency and Effectiveness Measures; SNAP QC separately measures PER, CAPER, and application-processing timeliness. Initial SNAP applications generally must be processed within 30 days, or 7 days for expedited service.

DHS provided, including CAPER by district, denial rates tied to denial reasons over time and by district, procedural versus substantive closures, expedited SNAP and cases beyond the 7- and 30-day standards, and underpayments versus overpayments.

The goal is not fewer SNAP recipients; it is fewer wrong payments and fewer wrong denials or closures.

2. Three-month certification periods

DHS proposes that every new certification or recertification with **\$0 income** get a **three-month certification period**, followed by a standard renewal requiring an interview.⁶

The report explains the shorter-certification policy: someone can lose a job, qualify for SNAP, later get a new job, and fail to report it. Shorter certification also means more interviews and paperwork, which creates more chances for an eligible household to fall off for a process reason. DHS's own data show four-month recertifications rising from **9.8%** of renewals due in March, to **10.4%** in April, **20.0%** in May, and **30.5%** in June.⁷

What DHS does not say is what it will measure when these households come back three months later. DHS should track renewal completion, procedural closure, churn, and time without benefits for this group, and compare those results with the payment errors prevented. That would tell us whether the shorter period is actually helping or simply creating more churn and caseworker work.

3. Missing Reports: 100% agency error in the FFY 2025 PER sample

DHS says periodic reports were meant to make renewals easier and is ending them because incomplete or inaccurate reports became a major PER problem.⁸

DHS's FFY 2025 error sheet says **100% of the Missing Reports errors in the PER sample were agency errors**: DHS applied policy incorrectly and certified a household without a required report or with an incomplete one. **The 100% figure is specific to the sampled PER errors in the Missing Reports category**. It does not mean 100% of periodic reports, or 100% of all SNAP errors, were agency-caused.⁹

So I'm not sure periodic reports themselves were the problem. Before replacing simplified reporting with more full renewals and interviews, **DHS should separate errors caused by clients, workers, and Gateway/system problems**. If an incomplete form was accepted when policy required more, fix that first rather than adding paperwork for everyone.

⁶ Georgia DHS/DFCS Corrective Action Plan, pp. 4–5 (Shortened Certification Periods).

⁷ Georgia DHS/DFCS, SNAP Population and SNAP Recertifications, July 28, 2026, "SNAP Recertifications" worksheet: four-month recertifications were 7,243 of 73,976 renewals due in March (9.8%); 716 of 6,855 in April (10.4%); 10,844 of 54,333 in May (20.0%); and 12,293 of 40,370 in June (30.5%).

⁸ Georgia DHS/DFCS Corrective Action Plan, p. 3 (Ending Use of Periodic Reports).

⁹ Georgia DHS/DFCS, FFY 2025 Top Ten Error Descriptions ("Missing Reports": 100% agency error within that sampled PER error category).

4. Data matches

DHS plans to use more wage, new-hire, address, death, and other electronic data. Some of those records can be incomplete or outdated. DHS itself says the National Directory of New Hires can show that someone was hired and does not provide the pay rate or income from that job.¹⁰

Unless federal law allows automatic action, DHS should treat a mismatch as a reason to verify, not as proof that someone is ineligible. The household should have a chance to explain or correct the information.

This is why the pending Verified Upon Receipt waiver is important: it would let DHS treat certain reliable automated sources as verified when received, use that information to spot discrepancies, and avoid asking the household to prove the same fact again.¹¹

I also would ensure no one in the public conflates this with categorical eligibility. The waiver does not make an ineligible person eligible and does not change the eligibility rules. **It recognizes that information DHS already has can still be current and reliable.** Requiring a household to reproduce reliable information already in the system adds work for the household and the caseworker without necessarily improving accuracy.

5. Find It, Fix It

DHS's Find It, Fix It initiative uses an AI-supported statistical model to flag cases with expenses above income and other anomalies.¹²

It is clear that AI and statistical models can produce errors, reproduce bias, and carry forward patterns already in the data. That is especially relevant here because **DHS's own FFY 2025 data show several major PER categories in which agency error, not client error, was the main cause.**

DHS should track:

- how many cases are flagged;
- how many actually contain an error;
- how many were correct;
- whether corrections increase or decrease benefits;
- whether underpayments are found as well as overpayments; and
- whether flags or resulting actions differ significantly by district or other relevant groups.

No one should lose SNAP or have benefits reduced because of the model's flag alone. A worker should review the case first.¹³

¹⁰ Georgia DHS/DFCS Corrective Action Plan, p. 4 (New Hire Notice Trigger: NDNH provides a hiring alert, not the pay rate or income generated from employment).

¹¹ Georgia DHS/DFCS Corrective Action Plan, p. 5 (Verified Upon Receipt waiver: certain automated sources could be treated as verified upon receipt, reducing redundant manual verification).

¹² Georgia DHS/DFCS Corrective Action Plan, p. 6 (Find It, Fix It).

¹³ NIST, Artificial Intelligence Risk Management Framework (AI RMF 1.0), including risks from harmful bias, data-quality problems, and unreliable model outputs.

6. Fraud

The General Assembly report includes fraud detection, while PER itself is not a fraud rate. DHS says PER includes overpayments and underpayments caused by worker errors, client errors, or both.¹⁴

DHS already has a Benefit Integrity and Recovery Unit (BIRU) that investigates recipient fraud, and BIRU already tracks results. DHS reports **more than \$15.8 million** in TANF/SNAP fraudulent overpayments identified in SFYs 2025 and 2026. The General Assembly PER report does not include those fraud measures.¹⁵

BIRU already tracks much of this. **DHS should separately report the fraud measures BIRU already uses, with enough detail to show whether fraud enforcement is actually working:**

- referrals and investigations opened;
- substantiated and unsubstantiated allegations;
- intentional program violations and administrative disqualification proceedings;
- criminal referrals and trafficking cases;
- claims established and dollars identified and recovered;
- investigation times; and
- staffing and caseload.

Ordinary mistakes, agency errors, and data discrepancies should not be treated the same way.

7. Second Party Review

I would use Second Party Review more heavily. DHS proposes it for certain flagged discrepancies, \$0-income cases with high expenses, expense outliers, workers with a history of errors, and some cases where an incomplete periodic review was allowed to move forward.¹⁶

If the possible problem is the caseworker's decision, I would have a second person review the decision before asking the household for more.

DHS should specify which cases require Second Party Review, including the state-defined thresholds for \$0-income/high-expense cases and other outliers. DHS should also track how many cases go through review, how much time it adds, and how often the result changes. DHS itself says the process should not "significantly delay processing."

Conclusion

Taken together, I think these changes would give us a better picture of what is actually driving Georgia's SNAP errors and where we should focus. We should be aggressive about actual fraud and incorrect payments, while fixing agency errors and avoiding new requirements that make it

¹⁴ Georgia DHS/DFCS Corrective Action Plan, pp. 2 and 6. The report states that PER includes overpayments and underpayments due to worker errors, client errors, or both.

¹⁵ Georgia DHS, Benefit Integrity and Recovery Unit (more than \$15.8 million in TANF/SNAP fraudulent overpayments identified in SFYs 2025–2026).

¹⁶ Georgia DHS/DFCS Corrective Action Plan, pp. 3–4 (Second Party Review criteria, thresholds, and instruction to avoid significantly delaying processing).

harder for eligible families to get or keep SNAP. The goal should be a program that gets the right benefit to the right people, with as few errors and unnecessary hurdles as possible.

Respectfully,

A handwritten signature in dark ink, appearing to read "Marvin Lim", followed by a long horizontal line.

Marvin Lim
State Representative
House District 98