



DCF Legislative Testimony

February 11, 2026

TESTIMONY OF: Dr. Carla Whiteside-Hicks, Director of Economic and Employment Services,
Department for Children and Families

TESTIMONY ON: Oral | Neutral | **SB363:** Requiring the department of health and environment (KDHE) and the Kansas department for children and families to enter into data-matching agreements with state agencies to verify eligibility for food and medical assistance and KDHE to submit certain data to the centers for medicare and medicaid services, prohibiting certain public assistance waivers or exemptions without legislative approval and self-attestation for purposes of determining eligibility for public assistance, limiting retroactive enrollment in medical assistance, immediately terminating eligibility for medical assistance upon confirmation of death of the enrollee, increasing the age limit for able-bodied adults without certain dependents and prohibiting certain exemptions from work requirements under the food assistance program.

DCF | SB363 | NEUTRAL

Chairwoman Erickson and members of the committee, thank you for the opportunity to provide testimony on Senate Bill 363.

Fiscal Impact

The total ongoing impact of SB 363 is as follows:

	SFY 26	SFY 27	SFY 28	FTE
Staff to Maintain and Draw Reports for Interfaces	\$0.00	\$162,753	\$162,074	2
Eligibility Staff	\$0.00	\$5,013,007	\$4,987,618	62
Additional SNAP E&T staff for Increased Caseload Included in the GBR	\$712,953	\$2,697,955	\$2,697,955	32
Additional Participant Expenses for Increased SNAP E&T Caseload Included in GBR	\$106,759	\$469,738	\$467,738	0
Total All Funds	\$819,712	\$8,343,453	\$8,315,385	96

Systems Interfaces with Other State Agencies

SB 363 directs the secretary of the Department for Children and Families (DCF) to enter into agreements with other state agencies to allow for the review, comparison and verification of data for food assistance eligibility. Data used from other state agencies to review food assistance eligibility includes death records, wage information, residency changes, incarceration status, changes in employment and lottery winnings. SB 363 requires more frequent review for these databases.

Currently, DCF maintains interfaces with multiple state and federal partners to obtain data to verify initial and continuing eligibility. These interfaces would need to be expanded in order to meet some of the data matching requirements as they currently are used for non-food assistance programs or do not fully meet the stated requirements.

The list below details the bill’s requirements which are to be monitored and compared to state sources. Information is also provided regarding their impact on the number of tasks assigned to be completed:

- Monthly basis, from the Office of Vital Statistics, including, but not limited to, death records. **Currently, data is provided and any differences from what is maintained in KEES are identified. These differences are assigned as tasks and researched, as this information is considered unclear and must be verified by staff. No significant change in the workload is expected.**
- On a quarterly basis, from the Department of Labor (KDOL), including, but not limited to, changes in employment or wages. **DCF currently has access to this information and uses it when determining initial eligibility and during redetermination reviews. Ongoing comparisons are expected to increase the number of tasks needed to be completed.**
- Monthly basis, including, but not limited to potential changes in residency as identified in out-of-state purchases, from the Electronic Benefits Transfer system. **This data is currently available and being reviewed for out-of-state activity. However, moving out of state is not an activity which must be reported between initial application, Interim Report and Reviews. These will now have to be assigned as a task to a worker.**

- Quarterly basis, from the Kansas Department of Revenue (KDOR), including, but not limited to, potential changes in income, wages or residency as identified by tax records. **There are currently no agreements with KDOR. This would require a new agreement to be developed. Once an agreement is in place, all changes would have to be assigned as new tasks for employees to work.**
- On a monthly basis, from the Kansas Department of Corrections (KDOC), including but not limited to, incarceration status. **DCF currently receives a batch file detailing these changes. This item has no significant impact on the tasks to be performed.**
- On a semi-monthly basis, KDOL, including, but not limited to, potential changes in employment, income or assets. **This would be a new activity. KDOL currently updates wage information quarterly, not semi-monthly.** No data is currently provided regarding employment and assets. This information is currently used only at the time of application, interim report or review and does not include continuous comparison to all food assistance cases. **The number of tasks generated from the updated comparisons are expected to increase the number of tasks assigned. Employers only report quarterly to KDOL, so requiring KDOL to be checked semi-monthly would increase work with little to no value.**
- Monthly data related to gambling winnings from the Kansas Lottery and Racing and Gaming Commission in excess of \$3,000. Information is currently provided related to winnings in excess of \$5,000. **The change in reporting limits is not expected to be significant.**

While current agreements can be modified to meet these requirements, these changes would create a significant number of new tasks due to the increased frequency of some checks and the amount of data required. This would require additional staff time, increased mail cost as we seek verification of unclear information and additional risk of errors due to information being known to the agency and possibly not acted on timely, as well the creation of new system agreements.

Information Verification

Section (4) of SB 363 states the following:

Unless required under federal law, the Kansas Department for Children and Families shall not accept self-attestation of income, residency, age, household composition, care-taker relative status or receipt of other coverage ... or request authority to waive or decline to periodically check any available income-related data sources to verify eligibility for TANF, food assistance, medical assistance or assistance under the child care subsidy program.

The following table details DCF programs and whether these items are currently verified beyond self-attestation:

	SNAP	TANF	Child Care
Income	Yes	Yes	Yes
Residency	Yes	No	No
Age	No	No	Yes, for benefit children only
Household Composition	Only if questionable	Only if questionable	Only if questionable
Caretaker Relative Status	No	Yes	No
Receipt of Other Coverage	KDHE	KDHE	KDHE

Various items for the different programs may rely on self-attestation of information. Requiring verification beyond self-attestation will create more tasks to be performed by eligibility workers. This will require more time to determine initial and ongoing eligibility. This additional verification may also result in benefits being delayed to needy and eligible families.

Food Assistance:

Per 7 CFR 273.2(f)(1)(x), “state agencies shall verify factors affecting the composition of a household, if questionable”. Based on this federal regulation, DCF would only verify household composition, if questionable.

Per 7 CFR 273.2(f)(2)(i), “the State agency shall verify, prior to certification of the household, all other factors of eligibility which the State agency determines are questionable and affect the household’s eligibility and benefit level”. Based on this federal regulation, DCF would only verify age and caretaker relative status, if questionable and would affect the eligibility of the household.

Staffing Impact

Additional staff will be required to manage the interfaces and produce the information needed to verify eligibility. These positions would be located in the Economic and Employment Services (EES) administration. These duties require the hiring of two Management Systems Analysts with an annual salary and benefits of \$66,576. Other expenses would also be incurred by these positions such as communications, travel, fees, etc. at an estimated cost of \$12,271 per FTE for the first year. The annual estimated costs for these positions including other operating costs are \$162,753 during the first year (SFY 2027).

Currently, DCF uses a simplified method for reporting changes to food assistance cases. Under this method between initial application, interim report and review, simplified reporting households are only required to report changes in gross monthly income that exceeds 130% of the FPL for their household size, households containing ABAWDs that reduce work hours under 20 hours per week, or lottery/gambling winning of \$4,500 or greater. Other changes which may increase or decrease benefit amounts are reported and calculated at the Interim Report or Review whichever occurs first.

The SNAP caseload averages about 100,000 adults per month. This population includes families and individuals who may move frequently. Additionally, those who are employed mainly work low-wage jobs with varying hours per week. These individuals may also change employment. These may result in frequent changes being noted to the various items being identified. Additionally, as similar information may be looked at from various sources with various time frames, the same changes may be identified more than once.

Based on the data comparisons to be carried out, the frequency with which differences and changes are identified and made would increase significantly. These changes will have to be reviewed by a case worker, and changes may need to be made to the individual’s case. Depending on the type of action being taken, changes could occur in consecutive months for items such as hours worked, or income earned. Each change would require action by the case worker. Per USDA regulations, program staff have ten days to review and initiate changes to the cases.

Due to the increased number of data sources being checked and the continuous nature of the checks, the frequency of updating food assistance benefits is expected to increase. As each change task must be assigned, reviewed and action taken, additional FTE will be needed.

Currently, there are 404 regional workers performing SNAP-related activities. The changes noted to comply with SB 363 (report reviews and information verification) are expected to increase the amount of work needed to be performed by 35%, or an additional 142 FTE.

These FTE would be benefits-eligible and additional building space would be needed. The following table details the salary and other operating expenses (OOE):

Item	FY 2027	FY 2028
Salaries and Benefits	\$3,779,724	\$3,840,143
Standard OOE	\$1,233,283	\$1,147,475
Total	\$5,013,007	\$4,987,618

An additional \$5 million is needed to fund the increase in staffing related to increased monitoring and review of benefits with increased data comparisons. This assumes a July 1, 2026, implementation date.

Impact on Error Rate

SB 363 increases the number of tasks that must be completed, which could also impact the SNAP Payment Error Rate. These rates are monitored at the federal level, and failure to maintain an acceptable rate could result in penalties against the state. Effective in Federal Fiscal Year 2028, states will be responsible for paying a portion of the SNAP benefits if their error rate is above 6%. All changes impacting benefits must be assigned and processed within 10 days. All of the data received would be considered known to the agency and would be required to be acted on, although many items would be considered unclear and would require additional verification, increasing opportunities for case errors. A potential SNAP Payment Error occurs if changes are not processed within this time frame.

For federal fiscal year 2024 (the most recent complete year), the Kansas error rate was 9.98%. This level of error would result in Kansas being responsible for 10% of the SNAP benefits paid, which equates to an estimated \$40 million in state general funds.

Prior to switching to the simplified reporting method for changes now being used related to food assistance, DCF used a reporting method similar to the proposal in SB 363. In FY 2003, using a change reporting method similar to what will be required under this bill, DCF had an error rate of 10.45%. Soon after adopting simplified reporting, the error rate dropped to 5.11%.

The proposed changes are expected to result in an increase in the payment error rate which could result in possible penalties. During FY 2019, one state, Maine indicated it used a similar reporting method. Its error rate during that period was 19.12% and penalties of \$2.7 million were assessed. The total SNAP benefits issued by Maine during that fiscal year totaled \$203.6 million, similar to the \$265.3 million issued by Kansas. Other states such as Iowa and Michigan also received penalties related to their SNAP payment error rates, though the benefits paid were significantly more than those issued in Kansas. Iowa was issued a penalty of \$2.8 million after issuing \$429.1 million in benefits. Michigan issued \$1.7 billion in benefits and was penalized \$10.9 million for its error rate. Any penalties assessed would require additional state funds.

SNAP Work Program

Additional funding related to the SNAP Work Program was included in the Governor’s Budget Recommendations. It is presented here for information purposes only and is not included in the additional funding requested for SB 363.

In July 2025, H.R.1 was passed by Congress and signed by the President. This bill made significant changes regarding work requirements for SNAP recipients. Changes to work requirements, effective October 1, 2025, include:

- Increasing the age of Able-Bodied Adult Without Dependents to 64 (previously it was under 60).
- Changing the exception of those with dependent children to only apply to children under 14 (previously it was 18 or younger).
- Removing work requirement exceptions for people experiencing homelessness, under 24 and aged out of foster care at 18, or veterans. These exceptions were set to expire on October 1, 2030.
- Established new exemptions for “Indian”, Urban Indian”, or “California Indian” as defined in the Indian Health Care Improvement Act.

SB 363 incorporates the first three changes into Kansas statutes. These changes are expected to make an additional 20,977 current SNAP recipients subject to work requirements. These persons would be assigned to the SNAP Employment and Training (E&T) program in DCF.

Historically, when these types of eligibility changes are made, about 9.3% of the impacted persons choose to participate in the SNAP E&T program. It is estimated an additional 1,951 individuals will be assigned to and participate in the SNAP E&T program. Currently, there are 19 non-supervisory FTE assigned to the SNAP E&T program to handle a monthly caseload of 1,171 individuals. To maintain the current staff/client ratio, an additional 32 FTE would be required. The following table details the additional costs associated with this expansion of the SNAP E&T program:

Administrative Costs	SFY2026 (1)	SFY2027
Salaries and Benefits for 32 FTE	517,881	2,071,523
Standard OOE Per FTE	195,072	626,432
Total Administrative Costs	\$ 712,953	\$ 2,697,955
Participant Expenses	SFY2026 (1)	SFY2027
Additional SNAP E&T Participants	1,951	1,951
Average Cost Participant Expenses Per Person/Per Month	\$ 18.24	\$ 20.06
Months	3	12
Total Participant Expenses	\$ 106,759	\$ 469,738
Total Overall Cost	\$ 819,712	\$ 3,167,693

(1) The SFY 2026 figure is based on three months.

Funds will be requested as state-only funds. DCF is allocated two types of federal SNAP E&T funds:

- 100% Administrative Funds require no state match and are used to help cover the administrative costs of operating the SNAP E&T program. These funds cannot be used for participant expenses, direct assistance to program participants.
- 50/50 SNAP E&T funds require the state to provide an equal match for all federal expenditures claimed. States are allocated a specific amount of these funds which may be used for administrative costs or participant expenses.

DCF will fully budget the Federal SNAP E&T funds expected to be allocated at the federal level. No funds are anticipated to be available to cover the projected increase in program expenses. DCF has requested additional funds from both sources in the past and will seek additional funds. However, over the past several federal fiscal years, these requests have been denied.