



Mike Braun, Governor  
State of Indiana

***Indiana Family and Social Services Administration***

402 W. WASHINGTON ST., P.O. BOX 7083  
INDIANAPOLIS, IN 46207-7083

E. MITCHELL ROOB JR., SECRETARY

**Memorandum: Executive Order 25-54**

Date: January 14, 2026  
To: Secretary Brooke L. Rollins  
From: E. Mitchell Roob Jr., Secretary, Indiana Family and Social Services Administration  
Subject: Executive Order 25-54: Informing Federal Lawmakers on Enabling Entrepreneurial Administration of Supplemental Nutrition Assistance Program Benefits by the States

This report is submitted in response to Indiana Executive Order 25-54 ("EO 25-54"), issued by Governor Braun. As a former U.S. Senator and Ranking Member of the Senate Subcommittee on Food and Nutrition, Specialty Crops, Organics, and Research, Governor Braun understands the administration of Supplemental Nutrition Assistance Program (SNAP) benefits from both the perspective of a federal legislator and state executive.

In April 2025, Governor Braun rolled out his "Make Indiana Healthy Again" initiative, a nation-leading agenda to make lasting improvements in the health of Hoosiers, strengthen pathways to self-sufficiency, and align public assistance programs with workforce development and measurable outcomes.

As part of Governor Braun's "Make Indiana Healthy Again" initiative, Executive Order (E.O.) 25-54 directs the Indiana Family & Social Services Administration (FSSA) and the Indiana State Budget Agency (SBA) to conduct a comprehensive review of federal laws governing the administration of the Supplemental Nutrition Assistance Program (SNAP) to determine how federal laws may limit states' abilities to innovate and successfully implement SNAP's statutory goals.

As part of the review, FSSA and SBA are to evaluate the program's effectiveness in achieving its statutory purpose of providing a nutritionally adequate diet to enrollees,



promoting self-sufficiency through quality Employment and Training programs, reducing improper payments and other administrative errors, and developing recommendations that enable a more entrepreneurial and flexible approach to state-level administration. Governor Braun's leadership in issuing EO 25-54 demonstrates a strong commitment to modernizing public service and empowering Indiana to deliver programs that are efficient, accountable, and responsive to the needs of its residents. This evaluation of SNAP's nutritional impact is critical to advancing Indiana's broader health objectives- and reducing diet-related chronic conditions among vulnerable populations.

### **Review of Federal Legislation and Regulations**

1. *Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (P.L. 104-193)*
  - Landmark welfare reform legislation that introduced work requirements and time limits for cash assistance programs
  - For SNAP, it established the Able-Bodied Adults Without Dependents (ABAWD) work requirement, limiting benefits to three months in a 36-month period unless the individual works or participates in a qualifying work program for at least 80 hours per month.
  - Marked a shift toward promoting employment and reducing long-term dependency on assistance programs.
2. *Food and Nutrition Act of 2008 (7 U.S.C. Chapter 51)*
  - Establishes the legal framework for SNAP, including eligibility, benefit levels, and administrative procedures.
  - Administered by the USDA's Food and Nutrition Service (FNS).
  - Codifies uniform national standards for program operation.
3. *7 CFR Parts 271–285 (Code of Federal Regulations)*
  - Provides detailed federal rules for SNAP administration, including definitions, eligibility criteria, benefit issuance, and quality control.
4. *Farm Bill Reauthorizations*
  - SNAP is reauthorized through the Farm Bill, most recently in 2018 (P.L. 115-334), with updates in subsequent legislation like the 2025 budget reconciliation law (P.L. 119-21).
5. *One Big Beautiful Bill Act of 2025 (P.L. 119-21)*

- Introduced new restrictions on SNAP eligibility and work requirements, and limited future updates to the Thrifty Food Plan.

## **How Federal SNAP Rules Limit State-Level Innovation**

### *1. Uniform Eligibility and Benefit Rules*

- States must follow federally defined income and asset thresholds, limiting flexibility to tailor eligibility to local economic conditions. Providing states with additional flexibility to adapt eligibility methodologies to local economic conditions can enhance program efficiency and stability. By allowing adjustments such as smoothing income fluctuations, modernizing asset calculations, and accounting for short-term earnings spikes, states can reduce administrative churn while maintaining benefit neutrality and federal cost controls. For example, in Indiana, this flexibility could help align eligibility with regional cost-of-living differences – such as those between high-growth areas like central Indiana and lower-cost rural counties – while supporting workers in industries with variable wages like manufacturing, logistics, and healthcare. This approach promotes fairness, improves administrative efficiency, and ensures consistent access to benefits without compromising federal standards.

### *2. Centralized Benefit Design*

- SNAP benefit levels are currently tied to the federally defined Thrifty Food Plan, which provides consistency nationwide. However, offering states greater flexibility could unlock opportunities to better meet local needs while staying within existing funding levels. For example, states could tailor benefit structures to improve access to healthy foods in rural areas with limited grocery options or in urban neighborhoods where smaller retailers are more common—all while maintaining overall program cost neutrality. This type of flexibility would empower Indiana to align SNAP benefit design with state nutrition priorities and address documented food access challenges more effectively.

### *3. Limited Flexibility in Program Integration*

- Federal rules restrict how SNAP can be integrated with other state-run programs (e.g., workforce development, Medicaid), making it harder to create holistic, person-centered service models. For example, Federal SNAP Employment and Training (E&T) rules require states to operate employment services under separate funding, reporting, and eligibility framework that does not fully align with state workforce systems. States

cannot easily blend SNAP E&T funds with broader workforce dollars to provide a single, coordinated employment plan, limiting the ability to offer seamless, person-centered services such as unified case management or shared performance metrics. If Congress were to create a cross-agency pilot authority, Indiana would be able to deliver a better product to Hoosiers for fewer administrative dollars and with better oversight.

#### *4. One-Size-Fits-All Administrative Standards*

- Indiana fully supports robust federal quality control, reporting, and oversight requirements to ensure accountability, program integrity, and the proper use of SNAP funds. These safeguards are essential to combat fraud and maintain public trust. At the same time, providing states with flexibility in how they meet these high standards would enable innovation and modernization without compromising accuracy or integrity. For example, Indiana could pilot advanced tools such as automated case reviews, real-time error detection, and data analytics to strengthen fraud prevention and improve timeliness – while reducing administrative burden and allowing staff to focus on complex cases and customer service. This approach would uphold federal objectives, enhance program integrity, and deliver better outcomes for

#### *5. Cost-Sharing Without Control*

- Currently, states cover 50% of administrative costs but have limited authority to redesign administrative processes or invest in innovations that could improve efficiency. Greater flexibility in federal SNAP rules would empower states to maximize efficiency and improve program accuracy. Expanded authority to redesign processes would allow innovations such as simplifying documentation standards, reducing duplicative reviews, and addressing common error drivers earlier in the case process. For example, Indiana could align eligibility determination and quality control requirements more effectively, reducing downstream quality control findings, limiting corrective rework, and improving overall accuracy. These improvements would enable states to use existing resources more strategically – delivering better outcomes for families without increasing program costs.

#### *6. Federal Approval Process Can Be Complex and Time-Intensive*

- While states often propose innovative pilots, navigating the federal approval process can take time and involve multiple steps, which may slow the pace of implementation.

## **SNAP's Effectiveness in Providing Nutritious Food**

Although SNAP was designed to help low-income families afford a nutritionally adequate diet, its impact on nutrition has been mixed. The program imposes minimal nutritional standards and does not restrict purchases of unhealthy items such as candy, soda, and energy drinks. USDA data show that sweetened beverages rank as the second-largest spending category for SNAP households, accounting for roughly 9% of food expenditures<sup>i</sup>. Research indicates that SNAP participants often consume diets lower in nutritional quality compared to non-participants, with high intake of sugary drinks and processed foods contributing to obesity and chronic disease risks.<sup>ii</sup>

## **Recommendations to Enable a More Entrepreneurial and Flexible SNAP Program**

### *1. Nutrition and Food Purchases*

- Update Federal Definitions
  - Revise allowable SNAP purchases to align with the program's original intent of supporting a nutritionally adequate diet.
  - Restrict purchases of non-nutritious items such as ultra-processed foods, sugary beverages, candy, energy drinks, and ice cream.
  - Permit nutritionally appropriate prepared hot foods to reduce barriers for older adults, individuals with disabilities, and those experiencing homelessness.
- Advancing Consistent Nutrition Standards Through a Federal Opt-in Model
  - USDA could strengthen nutrition outcomes and streamline administration by offering a standardized food restriction model that states may voluntarily adopt. This approach would promote consistency, reduce duplicative waiver processes, and allow USDA to centrally evaluate effectiveness and health impacts. By providing a clear, evidence-based framework, states like Indiana could implement robust nutritional standards more efficiently – supporting healthier choices for families while maintaining flexibility and reducing administrative burden.

### *2. Demonstration Projects*

- Reduce Administrative Burden
  - Beginning October 2026, states will assume 75% of SNAP administrative costs. This increased skin-in-the-game has great promise to incentivize states to improve the administration of their

SNAP programs, promote self-sufficiency, and better steward federal tax dollars. Federal requirements for demonstration projects should be streamlined to reflect this increased state financial responsibility.

- Streamlining Adoption of National Nutrition Standards
  - If USDA establishes strong, evidence-based nutritional standards at the national level, states ready to implement these standards should be able to opt-in directly – without the added burden of separate demonstration projects. States that prefer to explore alternative approaches could still participate in time-limited demonstrations, preserving their role as evaluative tools for innovation. This streamlined process would reduce unnecessary administrative hurdles, accelerate adoption of proven standards, and maintain flexibility for states committed to continuous improvement and better health outcomes.

### 3. *Self-Sufficiency and SNAP Employment & Training (E&T)*

- Increase Flexibility in Funding
  - Consolidate funding streams into more adaptable models that allow outcome-based payments and multi-year partnerships with training providers.
- Shift Metrics to Employment Outcomes
  - Federal performance measures should prioritize job placement, wage growth, and long-term employment rather than compliance with hourly activity requirements.
- Align Work Requirements Across Programs
  - Harmonize SNAP E&T rules with other programs (e.g., TANF) to reduce operational complexity and administrative costs.
- USDA Employment and Income Verification
  - USDA should provide timely employment and income data for applicants and recipients by leveraging federal and state workforce systems. This would reduce reliance on costly third-party vendors like Equifax and improve accuracy in eligibility determinations.

### 4. *Improper Payments and Administrative Errors*

- Simplify Eligibility Rules
  - Reduce complexity in SNAP eligibility policies to minimize error risk and administrative burden.

- Streamline Fraud Prevention Processes
  - Allow states to act immediately on verified interstate benefit matches (e.g., National Accuracy Clearinghouse) to reduce improper payments and fraud.

## 5. *Additional Recommendations*

- Modernize the Food and Nutrition Act
  - Permit states to require third-party identity verification (e.g., ID.me) to reduce fraud.
  - Require applicants to provide a phone number and contact information.
- Eliminate Broad-Based Categorical Eligibility (BBCE)
  - BBCE allows states to ignore SNAP eligibility guidelines. Ending BBCE would ensure SNAP serves the populations it was originally intended to serve.
- Address SNAP EBT Vendor Limitations
  - Increase competition in the EBT vendor market; currently only two vendors dominate the space, limiting innovation and cost efficiency.
  - Prohibit vendors from charging states individually for fraud-prevention updates.
  - Require EBT vendors to adopt industry-standard security measures, similar to credit card companies, to protect SNAP funds from skimming and online fraud.

The Indiana Family and Social Services Administration extends our deepest gratitude to Secretary Rollins for her dedicated service and leadership at the U.S. Department of Agriculture. Her commitment to strengthening nutrition programs and supporting states in delivering essential services has made a lasting impact on Hoosier families and communities, and across the nation. We appreciate her partnership and vision, which have helped advance innovation and ensure access to critical resources for those who need them most. We would welcome the opportunity to serve as a resource and provide further information as needed.

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<sup>i</sup> *Foods typically purchased by Supplemental Nutrition Assistance Program (SNAP) Households.* (2016, November). Retrieved December 15, 2025, from [Foods Typically Purchased by Supplemental Nutrition Assistance Program \(SNAP\) Households](#).

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<sup>ii</sup> *Shopping pattern and food purchase differences among Supplemental Nutrition Assistance Program (SNAP) households and Non-supplemental Nutrition Assistance Program households in the United States.* (2017, June 20). Retrieved December 16, 2025, from <https://pmc.ncbi.nlm.nih.gov/articles/PMC5484978/>.