

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

State of Minnesota,
by and through its Attorney General
Keith Ellison,

Plaintiffs,

v.

United States Department of Agriculture,
and Brooke Rollins, as Secretary of the
Department of Agriculture,

Defendants.

Case No.: _____

**DECLARATION OF
JENNIFER CASTILLO**

I, Jennifer Castillo, declare under penalty of perjury:

1. I am the Director of Community Services for Washington County, Minnesota (“Washington County”).
2. I make this declaration in good faith based on my knowledge of the facts set forth herein.
3. On December 16, 2025, Washington County received a directive from the United States Department of Agriculture (“USDA”) to begin a Supplemental Nutrition Assistance Program (“SNAP”) pilot project (the “Pilot Project”) which would require four counties in Minnesota (Hennepin, Ramsey, Washington and Wright) to recertify all SNAP households within 30 days. Failure to comply with the Pilot Project could result in non-compliance actions and negative impacts to Minnesota’s ongoing participation in SNAP.

4. Below is an illustration of SNAP figures for Washington County as of December 2025:

SNAP by the Numbers in Washington County As of December 2025	
Current Number of Households Served	5,447
Total Number of Individuals Served	10,394
Average Monthly Benefit per Family	\$317.46
Average Monthly Benefit per Person	\$166.37
Percent of SNAP Recipients over age 65	14%
Percent of SNAP Recipients under age 18	37%
Percent of SNAP recipients between 18-64 who are disabled	40%

5. Washington County's current SNAP operations are as follows:

- Most SNAP recipients must complete a recertification every six months.

Elderly, disabled, or homeless individuals with no earned income recertify annually.

- The current recertification process includes advance notice to clients, a phone interview and resubmission of verifications which takes an average of 2 hours a case.

- Washington County has 35 dedicated SNAP staff processing approximately 600 recertifications per month.

6. Washington County and the State of Minnesota retain multiple safeguards to ensure SNAP program integrity including case reviews, audits, use of verification systems including SAVE and Equifax, state and federal data matching, recertifications,

and more. Washington County has dedicated staff focused solely on prevention and investigation of fraud, waste and abuse in public assistance programs.

7. The Pilot Project requires that Washington County perform the following:

- Recertify all 5,447 Washington County SNAP households within 30 days of December 16, 2025.
- Schedule and conduct in-person interviews with all Washington County SNAP households.
- Verify additional requirements, including assets and excluded household member information.

8. For Washington County to complete the Pilot Project within the 30-day deadline, we estimate it would require 106.4 full-time employees based on the following:

- There are 5,447 SNAP cases in Washington County as of December of 2025.
- There are 16 business days remaining in the 30-day deadline (excluding weekends and federal holidays)
- There are 6.4 productive hours per worker per day (accounts for lunch, breaks, and necessary interruptions)
- Each SNAP recertification takes approximately 2 hours end-to-end, including notices, interviews, system updates, and benefit approval.
- $5,447 \text{ SNAP cases} \times 2 \text{ hours per recertification} \div 16 \text{ business days} \div 6.4 \text{ hours per worker/day} = 106.4 \text{ full time employees.}$

Currently, Washington County has 35 full-time employees who are trained for SNAP recertification. However, not all 35 employees can be allocated to the Pilot Project without causing issues with other essential government programs and mandates.

9. Along with these current staffing impediments, the following barriers and constraints are caused by the Pilot Project's accelerated 30-day deadline:

- **Insufficient notice to households:** Under the accelerated deadline, a significant share of SNAP households may not receive recertification notices with enough lead time to schedule and complete required in-person interviews by the 30-day deadline, which would result in termination from the program. SNAP households that have recently recertified may be required to repeat steps, thereby increasing confusion, risk of duplicative actions and inconsistent case processing.

- **Unclear Pilot Project requirements:** Guidance provided by the Pilot Project is not sufficient to implement mass recertifications. For example, key definitions and parameters remain unresolved, including what constitutes a "full eligibility" determination and whether the 30-day deadline is measured in calendar days or business days.

Unfunded staffing impacts: No additional funding has been identified to support the increased workload. Hiring and training eligibility staff cannot be completed within the Pilot Project timeframe. Specifically, it takes over 6 months to fully train staff on recertifications, and as a result, only existing SNAP staff in Washington County can be used. Further, Washington County cannot dedicate all staff exclusively to the Pilot Project, because continuation-of-operations plans would be required to remain compliant

with other program mandates and to prevent disruption of other essential benefits for residents.

- **Operational and systems constraints:** Washington County does not have adequate interview space to conduct in-person interviews for over 5,400 active SNAP households within the required timeframe. Also, reliance on mailed notices can delay receipt and scheduling, and State eligibility systems and technology limitations may constrain timely processing and tracking of recertification activity, all of which could result in termination from SNAP.

10. Compressing over 5,400 SNAP recertifications into a 30-day time period is not feasible for Washington County. If the Pilot Project's 30-day deadline were to remain in place, it would undermine program integrity by straining current staff capacity, which could increase errors, and could result in eligible households being dropped from SNAP. Leveraging existing safeguards through county and state avenues under a reasonable timeline remains the best path to continuing to ensure program integrity.

I DECLARE UNDER PENALTY OF PERJURY THAT EVERYTHING I HAVE STATED IN THIS DOCUMENT IS TRUE AND CORRECT.

s/ Jennifer Castillo

Jennifer Castillo
Washington County Director of
Community Services.

Dated: 12/23/25

County of Washington, State of Minnesota