

**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.: 25-CV-04767-LMP-JFD

**DECLARATION OF JAMI
GOODRUM**

I, Jami Goodrum, declare under penalty of perjury:

1. I am the Director of Health and Human Services, Wright County, and I make this declaration in good faith based on my knowledge of the facts set forth herein.
2. Wright County is a political subdivision of the State of Minnesota.
3. In the State of Minnesota, counties administer most forms of public assistance under the State's supervision, including the Supplemental Nutrition Assistance Program ("SNAP").
4. Wright County Health and Human Services is the service area within Wright County that administers SNAP for Wright County residents.
5. The State of Minnesota has promulgated the Combined Manual, which contains policies relating to the administration of SNAP and other public assistance programs. The Combined Manual can be accessed here:

https://www.dhs.state.mn.us/main/idcplg?IdcService=GET_DYNAMIC_CONVERSION&RevisionSelectionMethod=LatestReleased&dDocName=CombinedManual.

6. The Combined Manual describes the typical recertification process for SNAP, including counties' typical role in the recertification process:

https://www.dhs.state.mn.us/main/idcplg?IdcService=GET_DYNAMIC_CONVERSION&RevisionSelectionMethod=LatestReleased&dDocName=lp_cm_0009.

7. As described in the Combined Manual, the counties' role in the typical recertification process includes receiving forms and documentation, requesting verifications, and conducting interviews.

8. In the typical recertification process, SNAP recipients are notified 45 days prior to the end of their current recertification period, which gives the recipient and counties up to 45 days to complete the necessary recertification steps.

9. Wright County conducts most interviews via phone in the typical recertification process, since the Combined Manual does not require face-to-face interviews and most recipients prefer phone interviews.

10. Wright County is in receipt of the letter from Brooke L. Rollins, U.S. Department of Agriculture Secretary, to Minnesota Governor Tim Walz dated December 16, 2025 ("Letter"), requiring that in-person recertifications be conducted for all SNAP households in Hennepin, Ramsey, Washington, and Wright counties within 30 days of receipt of the Letter.

11. Wright County has analyzed whether it would be possible for Wright County to conduct these recertifications in the period required by the Letter.

12. Wright County has 2,861 active SNAP cases for the month of December 2025. Those 2,861 cases include 5,522 beneficiaries.

13. Wright County typically processes roughly 300 recertifications per month. The Letter requires that roughly 10 times that many recertifications be conducted within 30 days, and again, the typical recertification process allows 45 days for completion.

14. Wright County estimates that it would take approximately 2 hours of Wright County staff time to complete each recertification. This estimate is subject to significant limitations, however, as it is difficult for the County to reasonably predict how long to estimate for each in-person interview because many in-person interviews of SNAP recipients who are elderly, disabled, lack available transportation, etc. will need to be conducted in the recipient's home, which requires additional staff travel time.

15. In addition, Wright County will have difficulty in accommodating the number of in-person interviews that would need to occur in County facilities because they do not meet a hardship due to lack of available meeting space.

16. Nonetheless, assuming 2 hours for each recertification, Wright County would need to dedicate 5,722 staff hours to complete recertifications in all 2,861 active SNAP cases.

17. Wright County has nowhere near 5,722 staff hours to dedicate to SNAP recertifications in the period required by the Letter.

18. Wright County has approximately 18 full-time equivalents ("FTEs") who are trained in SNAP administration, have necessary system access, and are available to work during the period required by the Letter.

19. It would take these 18 FTEs working exclusively on SNAP recertifications almost 20 hours every single day for the 16 remaining calendar days (including weekends and holidays) to meet the estimated staffing need. However, not all 18 employees can be allocated to the pilot project without causing issues with other essential programs and mandates. No additional funding has been identified to support the increased workload. Overtime labor costs alone are estimated at \$165,000.

20. It is impossible for Wright County to conduct recertifications in all active SNAP cases in Wright County in the period required by the Letter, as demonstrated above.

21. Attached hereto as Exhibit A is a summary sheet of SNAP numbers in wright county as of December 2025.

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

s/ Jami Goodrum
Jami Goodrum

Dated: 12/29/2025
County of Wright, State of Minnesota