

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

<p>State of Minnesota, by and through its Attorney General Keith Ellison,</p> <p style="text-align: center;">Plaintiffs,</p> <p style="text-align: center;">v.</p> <p>United States Department of Agriculture, and Brooke Rollins, as Secretary of the Department of Agriculture,</p> <p style="text-align: center;">Defendants.</p>	<p>Case No.: _____</p> <p style="text-align: center;"><b>DECLARATION OF REGINA WAGNER</b></p>
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I, Regina Wagner, declare under penalty of perjury:

1. I am the Director of Economic Supports for Hennepin County, and I make this declaration in good faith based on my knowledge of the facts set forth herein.
2. Hennepin 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. Hennepin County Economic Supports is the service area within Hennepin County that administers SNAP for Hennepin 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](https://www.dhs.state.mn.us/main/idcplg?IdcService=GET_DYNAMIC_CONVERSION&RevisionSelectionMethod=LatestReleased&dDocName=CombinedManual) (last visited, December 23, 2025).

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](https://www.dhs.state.mn.us/main/idcplg?IdcService=GET_DYNAMIC_CONVERSION&RevisionSelectionMethod=LatestReleased&dDocName=lp_cm_0009) (last visited, December 23, 2025).

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. Hennepin 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. When a recipient requests a home interview as part of the typical recertification process because of hardship conditions like illness, transportation difficulties, care of household members, prolonged severe weather, work responsibilities, or other conditions, Hennepin County must arrange for staff to travel to a recipient's home to conduct the interview.

11. Hennepin 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 recertifications be conducted for all SNAP households in Hennepin, Ramsey, Washington, and Wright counties within 30 days of receipt of the Letter.

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

13. Hennepin County has 54,316 active SNAP cases for the month of November 2025. Those 54,316 cases include 86,987 beneficiaries.

14. Hennepin County typically processes roughly 4,500-5,500 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.

15. Hennepin County estimates that it would take approximately 2 hours of Hennepin 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.

16. In addition, Hennepin County’s physical spaces cannot accommodate the number of in-person interviews that would need to occur in County facilities because they do not meet a hardship exception to occur in home.

17. Nonetheless, assuming 2 hours for each recertification, Hennepin County would need to dedicate 108,632 staff hours to complete recertifications in all 54,316 active SNAP cases.

18. Hennepin County has nowhere near 108,632 staff hours to dedicate to SNAP recertifications in the period required by the Letter.

19. Hennepin County has approximately 278 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.

20. It would take these 278 FTEs working exclusively on SNAP recertifications for approximately 13 hours every single day for the 30 calendar days (including weekends and holidays) between December 16, 2025 and January 15, 2025 to meet the estimated staffing need.

21. It is not possible for Hennepin County to require that these FTEs work this many hours per day or on weekends and holidays, and even if it was, the County estimates that it would require staff to work and be paid for approximately 60,000 hours of evening and weekend work hours that staff do not normally work, at a cost of roughly \$4 million just in these additional staffing costs.

22. Dedicating the available FTEs to work exclusively on SNAP recertifications would also prevent these FTEs from performing other critical work, including staffing telephone lines for SNAP and cash assistance programs (which receive approximately 80,000 calls per month); processing new applications, changes, or updates for SNAP and cash assistance programs; working on other public assistance programs, and all onsite

services other than SNAP recertifications (Hennepin County sees about 10,000 residents onsite per month). All of this would hinder Hennepin County residents from getting the support they need.

23. It is also likely that some SNAP recipients will lose eligibility not because they do not meet SNAP eligibility criteria, but because they cannot complete the recertification process within 30 days. Reductions and interruptions in SNAP eligibility are likely to result in local governments, nonprofits, and others needing to step in to provide food support to vulnerable Hennepin County residents.

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

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

*s/Regina Wagner*  
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Regina Wagner

Dated: December 23, 2025  
County of Hennepin, State of Minnesota