

EXHIBIT 30

DECLARATION OF BRIAN P. HOGAN

I, Brian P. Hogan, declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, as follows:

1. I am a resident of the State of North Carolina. I am over the age of 18 and understand the obligations of an oath.

Professional and Agency Background

2. I am the Deputy Director of Nutrition for the North Carolina Department of Health and Human Services (NCDHHS), Division of Child and Family Well-Being (DCFW).

3. I make this declaration based on personal knowledge and on my review of information and records gathered by agency staff.

4. The North Carolina Department of Health and Human Services is one of the largest, most complex agencies in the state of North Carolina, and has approximately 17,000 employees. It is responsible for ensuring the health, safety, and well-being of all North Carolinians, providing human service needs for special populations including individuals who are deaf, blind, developmentally disabled, and mentally ill, and helping poor North Carolinians achieve economic independence.

5. The mission of DCFW at NCDHHS is to ensure that North Carolina's children grow up safe, healthy and thriving in nurturing and resilient families and communities. DCFW was established as a new division at NCDHHS in January 2022 with the aim of integrating mental health, physical health, and social programs to provide coordinated and streamlined whole-family care. DCFW operates major nutrition programs for children, families, and seniors.

6. As the Deputy Director of Nutrition, I provide strategic oversight for a portfolio of North Carolina's federally-funded nutrition programs including the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC), the Child and Adult Care Food Program (CACFP), the Food and Nutrition Services (FNS) program (also known as the Supplemental Nutrition Assistance Program, or SNAP), the SUN Bucks program (also known as the Summer Electronic Benefit Transfer (EBT) program), and the Disaster Supplemental Nutrition Assistance Program (D-SNAP) in accordance with federal and state statutes, regulations, and policies.

7. SNAP, one of the programs administered by NCDHHS, involves the issuance of monthly electronic benefits that can be used to purchase food at authorized retail stores.

SNAP in North Carolina

8. SNAP is a key part of North Carolina's efforts to address hunger by supplementing the food budget of low-income families so they can purchase healthy food. For example, during September 2025, North Carolina issued approximately \$234,431,225 in nutrition benefits to 1,343,381 North Carolinians who were eligible for the program, more than 12% of the State's total population. North Carolina households received an average of \$175 per participant during September 2025 to help meet their basic subsistence and nutritional needs. Approximately 43% (581,412) of North Carolina's SNAP participants in September 2025 were children, and 17% of participants were children under the age of 7. Approximately 43,537 of North Carolina's SNAP participants in September 2025 were babies (under the age of 18 months). Approximately 151,793 of North Carolina's SNAP participants in September 2025 were elderly adults over the age of 65.

9. NCDHHS administers the SNAP program in North Carolina pursuant to N.C. Gen. Stat. § 108A-51. Pursuant to federal law, NCDHHS administers SNAP on behalf of the United States Department of Agriculture (USDA) and is responsible for the issuance, control, and accountability of SNAP benefits and Electronic Benefit Transaction (EBT) cards; ensuring program integrity; and supervising local County Department of Social Services offices' day-to-day administration of SNAP across all 100 of North Carolina's counties, including processing applications for SNAP benefits and certifying eligible applicant households. 7 U.S.C. § 2020(a)(1); 7 C.F.R. § 271.4; 7 C.F.R. § 274.2. USDA funds the entirety of SNAP benefits in North Carolina, though North Carolina and the federal government split administrative costs. 7 U.S.C. § 2025(a).

10. For Federal Fiscal Year 2025, North Carolina budgeted approximately \$196 million in state and county funds to pay for SNAP administration. This spending is expected to generate approximately \$196 million in SNAP federal financial participation, to cover half of anticipated administration costs.

11. By the end of October 2025, North Carolina will have spent approximately \$13 million in state and county funds to pay for SNAP administration during the month of October and in anticipation of issuing November benefits as per the typical issuance schedule. NCDHHS did so with the expectation that SNAP would continue to provide benefits to low-income individuals in North Carolina.

USDA's Lapse of Appropriation Funding and Demand to Withhold Benefit Data

12. North Carolina has a contract with a financial services vendor, Fidelity Information Services (FIS, or "Vendor"), to provide EBT processing services for SNAP and other state-funded NCDHHS programs. These services include processing benefit authorizations

provided by NCDHHS; managing the accounts through which those benefits are made available to recipients; and processing the financial transactions that transmit payments to retailers that accept payments from those accounts.

13. The Vendor's invoices for its services rendered under its contract with NCDHHS are paid by North Carolina. Each month, NCDHHS's Vendor, on behalf of North Carolina and USDA, loads the full value of each household's monthly SNAP benefit allotment into the household's account. The household members access their account by using their EBT card to purchase food in a similar manner to the way one uses a debit card.

14. As part of the SNAP administration process, NCDHHS is required to regularly transmit various types of electronic benefit issuance data files ("benefit files") to its Vendor. These benefit files contain information related to individuals who have been determined eligible for SNAP benefits, and the benefit level for that individual, alongside other information. NCDHHS sends multiple benefit files to the Vendor, including monthly files for active SNAP recipients. Further, NCDHHS sends benefit files for SNAP recipients newly approved that month, a subset of which are individuals who have been approved for expedited SNAP benefits.

15. NCDHHS uses an in-house case management system called NC FAST to generate benefit files, among many other functions.

16. Once the Vendor receives the benefit files from NCDHHS, the Vendor uses that information to authorize benefits for SNAP recipients and to subsequently load the approved monthly SNAP benefit allotment on SNAP recipients' individual EBT cards. Recipients can then use their individual EBT cards to purchase food, as of the benefit availability date, at authorized SNAP retailers.

17. U.S. Department of Agriculture's Food and Nutrition Service (USDA-FNS) manages the process of certifying retailers for participation in the SNAP program. SNAP recipients can only use their EBT card at approved retailers.

18. When SNAP recipients use their EBT card at a retailer's point of sale machine, an electronic message goes from the retailer's cash register to the Vendor to verify a variety of conditions including the availability of funds, and if sufficient funds are available. If the purchase is approved, the customer's EBT account is immediately debited and the retailer's account gets credited. Neither NCDHHS nor any other state agency in North Carolina ever receives SNAP benefit funds as part of this process.

19. In accordance with this process, NCDHHS transmits a series of nightly and batch benefit files to its Vendor pursuant to a preset transmission schedule.

20. NCDHHS requires lead time to process SNAP benefits prior to the month in which the benefits will be issued. On October 31, NCDHHS transmits a batch file to its Vendor, which indicates all currently certified households authorized to receive benefits in November, as of October 31st. NCDHHS then staggers the issuance of benefits over the first 21 days of a month. NCDHHS then transmits in its nightly file any households and allotment amounts scheduled for issuances on the next day. NCDHHS repeats this through the 20th day of the month, progressively submitting associated benefit files for recipients whose SSN ends in numbers 1 through 9, with the last issuances processed on the 21st of the month for individuals with an SSN ending in 0. For example, NCDHHS is scheduled to start transmission of relevant benefits files to the Vendor on the evening of November 6th, for individuals whose Social Security Number (SSN) ends in "3," so that their issuances will be available on November 7th.

21. In addition to the cyclical monthly benefit issuance process outlined above, NCDHHS also submits daily benefit files to the Vendor, which contain benefits issued for newly certified households, including households that filed expedited applications. In addition, when an agency approves a household for expedited SNAP benefits after the 15th of a month, the agency has discretion to approve not only the prorated amount of benefits for the month of eligibility, but also benefits for the following month. North Carolina has adopted the policy of issuing combined monthly allotments in these circumstances, with the intent of quickly distributing needed nutrition support to North Carolina households at the greatest risk of food insecurity. When processing benefit allotments at the end of a calendar month for expedited applications, NCDHHS thus issues, in part, benefits that are allotted for both the month in which the benefit files are submitted *and* the subsequent incoming month.

22. If NCDHHS fails to send benefit files to the Vendor timely by the agreed upon schedule, delivery of benefits to individual households will be delayed.

23. On September 30, 2025, USDA released a “Lapse of Funding Plan[.]” stating that such a plan was required by the Office of Management and Budget to outline the approach to follow “for agency operations in the absence of appropriations.” U.S. Dep’t of Agric., Lapse of Funding Plan (2025), at 4, previously available at <https://www.usda.gov/sites/default/files/documents/fy2026-usda-lapse-plan.pdf>. The plan stated that “there is a bona fide need to obligate benefits for October . . . thereby guaranteeing that benefit funds are available for program operations even in the event of a government shutdown at the beginning of a fiscal year.” *Id.* at 15. The plan further stated that “Congressional intent is evident that SNAP’s operations should continue since the program has been provided with multi-

year contingency funds” that are “available to fund participant benefits in the event that a lapse occurs in the middle of the fiscal year.” *Id.*

24. On October 10, 2025, less than two weeks after the USDA Lapse of Funding Plan was released, the USDA-FNS Acting Associate Administrator Ronald Ward sent NCDHHS a letter addressed to all SNAP State Agency Directors of all State Agencies as well as Regional SNAP Directors of all regions. The October 10 letter stated that “if the current lapse in appropriations continues, there will be insufficient funds to pay full November SNAP benefits for approximately 42 million individuals across the Nation.” The letter further stated that the USDA “has begun the process of fact finding and information gathering to be prepared in case a contingency plan must be implemented.” USDA also indicated that it “[understood] that several States would normally begin sending November benefit issuance files to their [EBT] vendors soon.” Noting “the operational issues and constraints that exist in automated systems, and in the interest of preserving maximum flexibility,” the letter indicated that USDA was “forced to direct States to hold their November issuance files and delay transmission to State EBT vendors until further notice.” The letter further demanded that the States also hold “on-going SNAP benefits and daily files.”

25. On October 24, 2025, two weeks after receiving the directive to delay transmission of November issuance files to State EBT vendors, NCDHHS received a memorandum from Patrick A. Penn, USDA Deputy Under Secretary, notifying State Agencies that USDA FNS is suspending all November 2025 benefit allotments effective November 1, 2025, until FNS directs State agencies otherwise, and directing agencies to take immediate actions to implement this suspension. The memorandum further states that “FNS will notify State agencies of when the suspension is lifted to allow for immediate action to resume issuing

November and subsequent monthly benefits to eligible households.” Citing 7 CFR 271.7(e), the memorandum directs State Agencies to continue “eligibility and issuances, integrity/oversight, and system maintenance,” but “to limit administrative expenses.” However, the memorandum does not give any written reassurances that expended administrative expenses for November 2025 program operations will be reimbursed.

26. Shortly after receiving the Patrick A. Penn memorandum from USDA’s Southeast Regional Office (SERO) on October 24, 2024, NCDHHS also received correspondence from SERO with an unsigned, undated partisan memorandum on USDA letterhead. The memorandum is titled “Impact of the Government Lapse on November Supplemental Nutrition Assistance Program (SNAP) Household Benefits,” and states “If not for Congressional Democrats blocking government funding, November SNAP benefits would be paid on-time.” The memorandum also notes that “States cannot cover the cost of benefits and be reimbursed,” even if willing.

27. Due to the Vendor’s data submission schedule for North Carolina, NCDHHS faces the threat of benefit interruption as early as October 31, 2025. In addition, NCDHHS has already been delaying issuances of November allotments for households approved for expedited application filed after October 15, 2025. Each day in which NCDHHS is delayed from submitting benefit files results in continued benefit interruption and statewide food insecurity for some of the most vulnerable residents of North Carolina.

28. Failure to issue SNAP benefits to qualified recipients in North Carolina will lead to immediate food insecurity for approximately 1,358,784 people in North Carolina and unprecedented reliance on already overwhelmed food banks that will simply not be able to meet the significant surge in demand. SNAP is the largest anti-hunger program in North Carolina. As a result, the sudden lack of benefits for otherwise eligible individuals and families in SNAP will

have devastating consequences on the public health of North Carolina and downstream effects on the safety net programs that currently fill needs that SNAP does not cover.

29. The uncertainty of whether SNAP benefits will continue during this shutdown creates food insecurity for SNAP beneficiaries by threatening their reliable access to food and forcing them to start rationing what are already subsistence-level benefits. Any disruption in SNAP benefits will force families to scramble for alternatives, including possibly going into debt or skipping meals entirely.

30. SNAP is also an economic driver for North Carolina local businesses. Approximately 9,260 merchants in North Carolina accept SNAP benefits for food purchases. If millions of North Carolina residents are forced to cut back on food spending at once, this will immediately and drastically affect the economic well-being of vendors, farmers, and stores across North Carolina. Already, as of October 25, 2025, NCDHHS is delaying the transmission of approximately \$224,000,000 in benefits to approximately 607,000 North Carolina households for November 2025. In addition, we have already stopped issuances of approximately \$1,100,000 in benefits to approximately 2,396 households who have filed expedited applications due to their immediate food insecurity. Not only does that harm North Carolina's residents, it also a loss of \$224,000,000 for North Carolina's grocers, retailers, and stores. It is estimated that between 11% to 18% of North Carolina's grocers sales are from SNAP redemptions, with bigger impacts in rural communities.

31. I am informed and believe that North Carolina does not have the fiscal resources available to replace federally funded SNAP benefits with state-funded equivalent benefits. In addition, assuming that North Carolina could create a short-term budgeting strategy to cover the

costs, USDA has now stated that if States did cover the costs of benefits, States would not be reimbursed by USDA.

Administrative and Operational Burdens on NCDHHS

32. The actions to suspend the availability of SNAP benefits for November 2025 would significantly erode trust between NCDHHS and its residents built over many years and through the dedication of significant resources.

33. To properly effectuate its safety net programs, NCDHHS has devoted years of work to overcome stigma, misinformation, and other barriers to access. NCDHHS is the representative of the broader SNAP framework to NC residents: if households experience delays in receiving crucial benefits, they are likely to feel that NCDHHS has failed or engaged in wrongdoing. NCDHHS has fostered trust with North Carolina residents and stakeholders by representing to them that SNAP eligibility and compliance with programmatic requirements will lead to timely benefits issuance. SNAP benefits directly fund one of the most crucial basic human needs: access to food. Food is a non-deferable need. Failure to deliver on that basic need as promised is a deep violation of residents' trust.

34. Furthermore, loss of trust among North Carolina residents will likely lead to decreased SNAP enrollments, which in turn will cause irreparable long-term harm and costs to the State in the form of increased healthcare and safety net costs, and expending of resources to rebuild trust in the public agency. USDA-FNS has acted in disregard of those reliance interests of North Carolina.

35. The actions to suspend the availability of SNAP benefits for November 2025 also unduly burdens NCDHHS's already limited administrative resources.

36. Once the current government shutdown began, on October 1, 2025 USDA sent NCDHHS a letter regarding the lapse in regular appropriations, stating that "SNAP eligible

households will receive monthly benefits for October” and that “funding is available for State administrative expenses (SAE) for October.” The letter directed state agencies to “continue to administer the program in accordance with Federal statute and regulations.”

37. NCDHHS continued its normal operations, including processing new applications and preparing benefit issuance files for November benefits, through October, in part due to the representations in USDA’s October 1 letter.

38. Further, because USDA indicated in the October 10, 2025 letter that NCDHHS is to hold these benefit files “until further notice.” Then, on October 24, 2025, USDA notified NCDHHS to immediately suspend November 2025 benefit allotment issuances until USDA directs otherwise, NCDHHS must prepare for SNAP benefit interruptions for an indefinite period of time. A disruption of any length would burden NCDHHS, with the extent of this burden increasing in relation to the duration of the disruption as the scale of resources required to manage the disruption mount over time. Moreover, the ambiguity of not knowing the ultimate duration of a disruption itself exacerbates the burden on NCDHHS because NCDHHS has to dedicate additional resources to planning for multiple contingencies, e.g., holding multiple meetings and responding to multiple inquiries with concerned stakeholders due to the uncertainty of a potential food insecurity crisis; having to coordinate shifting, changing messages to governmental offices, media outlets, stakeholders, and participants given the uncertainties provided by USDA’s guidance, which are compounded by its failures to timely address misinformation circulated in the media; programming and reprogramming NC FAST, amending program policy, and transmitting instructions to North Carolina counties to respond to the contingencies and directives from USDA has required allocation of NCDHHS staff and

resources away from core program functions, including implementation of H.R.1 (the “One Big Beautiful Bill Act” enacted in July 2025) provisions that were planned for November 1, 2025.

39. NCDHHS also anticipates that disruption to SNAP benefit issuance will result in additional administrative burden as a result of the need for additional customer support services and communications to recipients. NCDHHS will still be required to continue processing applications and recertifications and maintain normal eligibility verification procedures during the shutdown. Whether due to confusion around recertification requirements amid the news around the shutdown or otherwise, many applicants who are otherwise eligible for SNAP benefits may fail to meet their certification procedures and have their application denied or case closed. This disruption, sometimes referred to as “applicant churn,” will again require more NCDHHS resources during a crucial period of reorganization in light of H.R.1.

40. NCDHHS is already spending significant administrative resources managing communications and inquiries regarding the availability of SNAP benefits in November 2025. These communications are occurring, among other things, over call lines and in meetings with constituents and other stakeholders. Approximately eight NCDHHS program leadership staff have already been required to absorb this administrative burden to handle shutdown-related concerns, in lieu of other important initiatives such as new requirements under H.R.1.

41. NCDHHS also anticipates increased foot traffic and disruptions at North Carolina local Departments of Social Services (DSS) offices as hungry individuals and families learn they do not have access to November benefits, potentially necessitating increased security personnel and law enforcement presence for public safety. NCDHHS is a county-administered SNAP eligibility state, where the day-to-day eligibility determinations for SNAP are made by DSS workers across all 100 of North Carolina’s counties. Hundreds of client-facing local DSS office

staff will need to explain to SNAP participants that they will not receive the SNAP benefits they anticipated receiving, including recipients who need those funds in order to feed their children and put food on the table. Many of these local office staff will face significant burdens on their time. Increased communication demands will likely require NCDHHS and local county DSS offices to incur additional administrative burdens in the form of overtime pay to the limited staff available to handle this workload.

Impacts on North Carolina's Provision of Other Public Benefits

42. Regardless of the length of the shutdown, any delay in benefit issuance file transmission will have cascading effects on North Carolina's provision of public benefits (of which SNAP is only one component) and the resources required to administer the SNAP program.

43. Changes to the benefit file schedule has and will continue to require alterations in NC FAST and ad hoc scripting to comply with USDA directives and the uncertainty of immediate benefits resumption. In addition, when November benefits allotments are directed by USDA, there will be increased administrative burdens in issuance processing while numerous other states are trying to simultaneously transmit their own files to the Vendor (which serves as EBT vendor for approximately 32 other States).

44. All of these factors, caused by USDA's decisions to delay and suspend November 2025 SNAP issuances, in turn require NCDHHS to dedicate numerous information technology professionals, communications and operational resources, and administrative staff. This in turn has and will continue to cause NCDHHS to deprioritize numerous other pressing and important projects, including ongoing management of other NCDHHS issued benefits as well as preparation for upcoming systemic changes to SNAP administration following the effective date

of H.R.1. The USDA's actions have already and will continue to put a significant strain on NCDHHS's already overworked infrastructure and interfere with department operations, introducing interruptions to NCDHHS's ability to implement policy to determine eligibility for SNAP and continue operating the program throughout the rest of fiscal year 2026 at a time where NCDHHS must prioritize implementation of H.R. 1 provisions to address payment accuracy and timeliness.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this 27th day of October, 2025, in Raleigh, NC

A handwritten signature in black ink, appearing to read "Brian P. Hogan". The signature is fluid and cursive, with a long horizontal stroke at the end.

Brian P. Hogan
Deputy Director of Nutrition
NC Department of Health and Human Services,
Division of Child and Family Well-Being