

UNDERSTANDING THE SNAP PROGRAM

For food policy councils

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I INTRODUCTION

The Supplemental Nutrition Assistance program, or SNAP, is the largest federal food program, both in terms of its cost and the number of Americans it reaches. Almost 46 million people used SNAP benefits in 2015, which is one in seven Americans. To provide some context, that's more than the entire population of the state of California and about equal to the number of people who live in Georgia, Illinois, Michigan and Pennsylvania combined. These shoppers bought \$70 billion in groceries with SNAP "dollars".¹² SNAP serves as a tool to fight food insecurity and can also play an important role in the food retail landscape, especially in low-income communities.

There are many ways that food policy councils (FPCs) can influence the way SNAP works in their states and local communities. FPCs can also play an important role in national SNAP policy by providing feedback and new ideas to Congress and the United States Department of Agriculture (USDA). This guide will provide a brief history of the program, explain SNAP's basic framework and at what levels of government SNAP decisions are made.

II HISTORY

The concept of nutrition assistance dates back to the 1930s and was a response to the simultaneous farm and hunger crises of the Great Depression. A 1939 project allowed low-income families to purchase "food stamps" that boosted their overall food buying power and provided a mechanism for the federal government to distribute surplus domestic food commodities. This program ended in 1943 but Congress revived the idea in the late 1950s and President Kennedy's first Executive Order in 1961 instructed the USDA to implement a new version of the food stamp program.

The 1960s pilot was transformed with the Food Stamp Act of 1964, part of President Johnson's larger War on Poverty. The Act made the program permanent with the goals of improving the nutrition of low-income families and supporting the domestic agricultural economy. It maintained the "buy in" design that required participants to pay for a package of food stamps of a higher value but these food stamps were no longer limited to the purchase of specific foods and could be used to buy any domestic food for human consumption. The earlier program had included food stamp packages for the purchase of fruits and vegetables. The program gradually expanded geographically and was available nationwide in 1974³.

1. frac.org/reports-and-resources/snapfood-stamp-monthly-participation-data/
2. Formerly known as Food Stamps, many states use different names for the program. www.usac.org/_res/documents/li/pdf/samples/SNAP-Programs-by-State.pdf

3. www.fns.usda.gov/snap/short-history-snap

III SNAP TODAY

The Food Stamp Act of 1977, still in effect today, provided automatic eligibility for any low-income American who met basic income and asset requirements. Program participation is no longer capped by available funding and anyone whose income qualifies them is “entitled” to receive food stamps⁴. Food stamps are counter-cyclical; participation expands and contracts in response to the health of the economy. Participation surges during economic downturns and drops when the economy improves.⁵ The federal government pays 100 percent of SNAP benefits, and administrative costs are shared equally between the federal and state governments.

Congress reassesses the SNAP program about every five years as part of the farm bill deliberations, but the basic structure has remained much the same for the last 25 years⁶. Since 2008, the Food Stamp program has operated as an electronic benefit system (EBT) with magnetic stripe cards. The transition from paper vouchers to electronic benefits started in the 1980s, mimicking the growing use of credit cards and was designed to reduce participant stigma, administrative costs and fraud.⁷ The 2008 farm bill changed the program’s name to the Supplemental Nutrition Assistance Program (SNAP)⁸.

While SNAP is the principal way the U.S. government prevents widespread hunger, a key and often forgotten underlying assumption is that SNAP benefits will not account for all of an individual or family’s food spending during the month, thus the word “supplemental” in the program name. SNAP benefits are designed to fill the gap between a family’s available food budget and the monthly cost of the Thrifty Food Plan, a low-cost but nutritionally sound short-term diet. USDA has used the cost of the Thrifty Food Plan to calculate benefits since the 1960s. The poorer the individual or family, the greater the SNAP benefits. In 2015, the average monthly benefit for an individual was about \$127 per month⁹.

SNAP participation doubled between 2007 and 2014, serving a stunning 47 million Americans in the depth of the Great Recession. Almost half of SNAP participants are children, and most participating households include a child, elderly or disabled person^{10 11}.

IV SNAP POLICY THEMES

Many of today’s debates about SNAP are recurring themes that have been discussed at various times over the past 50 years. For example, how can one ensure that food benefits are easily available to all who need them without compromising program integrity? Farmers markets are an example of this challenge. While markets can provide affordable, nutritious food in underserved communities they are less formally orga-

4. Puerto Rico and the Northern Mariana Islands are exceptions and receive block grants in lieu of automatic benefits for all income eligible individuals. In these places SNAP is not an “entitlement” program since funding can run out and some income eligible people may not be served.

5. www.cbpp.org/research/summary-of-the-2014-farm-bill-nutrition-title-includes-bipartisan-improvements-to-snap

6. www.fas.org/sgp/crs/misc/RS22131.pdf

7. www.fns.usda.gov/sites/default/files/ops/IOMSNAPAllotments.pdf

8. The program is known as SNAP nationally but some states refer to their programs by different names (CalFresh, the Lone Star Card, etc) www.usac.org/_res/documents/li/pdf/samples/SNAP-Programs-by-State.pdf

9. www.cbpp.org/research/a-quick-guide-to-snap-eligibility-and-benefits; www.fns.usda.gov/pd/supplemental-nutrition-assistance-program-snap

10. www.ers.usda.gov/data-products/chart-gallery/detail.aspx?chartId=40104

11. www.cbpp.org/research/food-assistance/chart-book-snap-helps-struggling-families-put-food-on-the-table

nized than grocery stores so less easy to inspect and regulate. Should there be restrictions on the foods that can be purchased with SNAP benefits or does that violate individuals' right to choose? One review of SNAP studies concluded that the effect of proposed food restrictions on diet is unknown, and such restrictions may cause a decline in participation rates due to stigma¹². Is the Thrifty Food Plan still a reasonable way to calculate a 21st century family's food needs?

The SNAP program accounted for about 80 percent of the total spending in the last farm bill, which raised questions about whether it still makes sense to unite federal nutrition and farm programs in one piece of legislation. The food stamp program was founded on the conceptual union between the country's agriculture, rural economy and food assistance needs, but a global food system has made that connection more tenuous. On the other hand, there is growing interest from a variety of sectors in looking at food and farming as interrelated systems. From that perspective it makes sense to maintain production and consumption programs in one piece of legislation.

As unemployment falls but poverty and hunger rates remain high, some ask whether SNAP should be doing more. Is it just an anti-hunger program, or is it an anti-poverty program with a responsibility to help move participants into financial self-sufficiency? These are important questions and discussions that will be contentious in the next several years while pressure continues to reduce federal spending. FPCs see first hand how the program works in communities.

12. Andreyeva, T, Tripp, A. Schwartz, M. Dietary Quality of American by Supplemental Nutrition Assistance Program Participation Status A Systematic Review, *Am J Prev Med* 2015; 49 (4) 594-604

That information will be vital to policymakers at all levels of government as they try to balance conflicting needs.

V SNAP BASIC STRUCTURE

Federal

Congress establishes the legislative parameters of SNAP through the farm bill, a five-year, omnibus piece of legislation that also includes crop insurance, marketing, natural resources, energy programs, trade, and rural development initiatives. Congress uses the farm bill to establish large policy approaches, including requiring the transition from paper food stamps to delivering benefits electronically (EBT) and limiting benefits to legal U.S. residents.

USDA Food and Nutrition Service's job (FNS) is to turn farm bill legislative language into national SNAP program rules. For example, when Congress mandated the transition to electronic benefits, FNS wrote the regulatory requirements that all electronic benefit systems must meet and provided funding for state agencies to research and design the systems they wanted. FNS authorizes retailers to accept SNAP, oversees state SNAP implementing agencies, approves state processing contracts, oversees special programs (such as the new Employment and Training Center for Excellence¹³), grants funding and waivers to test innovative practices or to address systemic issues¹⁴, and manages program research¹⁵.

13. USDA to Establish First-Ever SNAP Employment & Training Center of Excellence. www.fns.usda.gov/pressrelease/2015/030215

14. USDA Helps States Improve Technology to Combat Trafficking of SNAP Benefits. www.fns.usda.gov/pressrelease/2015/fns-000915

15. Healthy Incentives Pilot. www.fns.usda.gov/hip/healthy-incentives-pilot

State

State legislatures have the authority to build on the legal framework Congress creates to guide how the SNAP program works in their states. This can include additional rules on eligibility, disqualification (such as failure to pay child support or pass a drug test), work and job training requirements or program outreach¹⁶. It might be helpful to think of this as similar to the structure of the Constitution: the states have authority in areas in which the federal government is silent or expressly provides options.

Increasing SNAP participation injects new food dollars into a state's economy but also increases the cost of administering the program. State policies can either suppress or encourage program participation. Disallowing direct qualification of households that receive Temporary Assistance for Needy Families will probably reduce case-loads, while authorizing and funding outreach campaigns may boost participation – and state administrative costs, for example.

State social or human services departments manage the program at the state level, implement the federal rules and adjust their programs to respond to mandates from their state legislatures. They also have a degree of authority over how the program is administered and can institute processes to make it work better. This can include augmenting the minimum benefit offered with state funds or staggering the dates of the month on which SNAP benefits are distributed. This can be especially helpful for smaller grocers with a large proportion of SNAP shoppers because it distributes food demand throughout the month and allows for stable stocking and

employment. State agencies can also authorize private organizations to conduct outreach, help clients enroll, and administer Disaster SNAP in cases of emergencies.

Local

City, county or private social service organizations are the face of the SNAP program at the local level. They explain how the program works to potential participants, collect client information, help with applications, and update information. While they do not make program rules, they act as the representatives of the state agency on the ground. They can also explain program changes that can seem mystifying to clients, such as the temporary increase in benefits in 2009 that was funded through the American Recovery and Reinvestment Act of 2009 (ARRA) and then disappeared suddenly in 2013 when the temporary ARRA funding ended.

VI FOOD POLICY COUNCILS & SNAP

FPC members understand how the food system works in their communities and can be reliable, trusted advisers to policymakers at every level of government. The breadth of the FPCs' membership means ideas can be considered from multiple points of view, and connections with advocacy organizations can make it easy to follow SNAP policy changes at the state and federal levels.

Federal Engagement: Members of Congress rely on information from groups in their districts and state. They do not have large staffs and FPCs can provide a valuable service by providing accurate, specific and timely information when changes to SNAP are being considered in the farm bill.

16. In 2015, for example, the Texas Legislature changed a state law that had barred convicted drug felons from ever being eligible for SNAP in the state

Federal agencies are required to solicit, consider and respond to public feedback before finalizing new program rules. No federal rule goes into effect without a public comment period and FPCs can have a real impact by submitting thoughtful responses to proposed rules. Notices of these processes are published in the Federal Register and FPCs can rely on national organizations to learn about when rules germane to their work are published and how to submit comments¹⁷. FPCs and individuals can also always meet with regional USDA representatives to learn more about the decisions over which they have authority and provide them information to help them in that process.

State-level engagement: Communicating with members of state legislatures and state agency personnel is easy and can be as important as developing relationships with federal officials. Many states have part-time legislatures and members need data and information to make informed decisions. State agency staff may appreciate feedback and ideas about ways in which the FPC could help ensure SNAP works as well as it can. To find out which organizations are working on SNAP policy in your state, contact your local food bank¹⁸ or state policy priorities center¹⁹.

Local level engagement: One of the most common ways that local FPCs work on SNAP issues is through advocating for the use of SNAP EBT benefits at farmers markets, and, in some cases, doubling the dollar value of those benefits to incentivize produce and other food purchases at the market. While these remain less than

1 percent of total SNAP purchases, it is a popular strategy because it supports local and regional producers, keeps more food dollars circulating in the local economy, supports neighborhood businesses and helps low income shoppers afford healthier food options. The 2014 farm bill includes the Food Insecurity Nutrition Incentives (FINI) grants for public agencies and non-profit organizations to test incentive approaches to help SNAP participants purchase fruits and vegetables²⁰.

VI CONCLUSION

Elected officials and government personnel often hear from special interests that represent narrow perspectives that may not reflect a larger public good. FPCs, on the other hand, reflect the combined wisdom of multiple stakeholders within a region's food system. The expertise of council members can give decision makers confidence that the proposals the FPCs promote are practical and will serve the whole community. Engage, it will make our system better.

17. www.federalregister.gov www.federalregister.gov/articles/2016/02/17/2016-03006/enhancing-retailer-standards-in-the-supplemental-nutrition-assistance-program

18. www.feedingamerica.org

19. statepriorities.org/state-priorities-partners/

20. nifa.usda.gov/program/food-insecurity-nutrition-incentive-fini-grant-program

RESOURCES

Program Regulations and Administration

- 2014 Farm Bill: Agricultural Act of 2014
www.gpo.gov/fdsys/pkg/BILLS-113hr2642enr/pdf/BILLS-113hr2642enr.pdf
- USDA: SNAP www.fns.usda.gov/snap/supplemental-nutrition-assistance-program-snap
- Center on Budget and Policy Priorities: A Quick Guide to SNAP Eligibility and Benefits
www.cbpp.org/research/a-quick-guide-to-snap-eligibility-and-benefits
- USDA: SNAP Waivers of Rules www.fns.usda.gov/snap/waivers-rules
- USDA: SNAP Policy Memos www.fns.usda.gov/snap/policy
- SNAP State Options www.fns.usda.gov/snap/state-options-report
- Federal Register www.federalregister.gov/agencies/food-and-nutrition-service

Data

- Food Research Action Center: SNAP Participation Data
frac.org/reports-and-resources/snapfood-stamp-monthly-participation-data/
- USDA: SNAP Participation Data
www.fns.usda.gov/pd/supplemental-nutrition-assistance-program-snap
- Center on Budget and Policy Priorities State Fact Sheets
www.cbpp.org/research/a-closer-look-at-who-benefits-from-snap-state-by-state-fact-sheets
- Feeding America Map the Meal Gap map.feedingamerica.org/county/2014/overall

SNAP Outreach

- USDA: SNAP Outreach www.fns.usda.gov/snap/outreach
- Food Research Action Center: SNAP Outreach Toolkit
www.frac.org/snapfood-stamps-outreach-and-access-toolkit/

Nutrition Education

- SNAP and Nutrition Education www.fns.usda.gov/snap/nutrition-education
- SNAP-Ed snaped.fns.usda.gov

Farmers Markets and EBT

- USDA: SNAP and Farmers Markets www.fns.usda.gov/ebt/snap-and-farmers-markets
- Farmers Market Coalition: SNAP Guide for Farmers Market
farmersmarketcoalition.org/education/snap/
- USDA: SNAP and EBT
www.fns.usda.gov/ebt/general-electronic-benefit-transfer-ebt-information

State and Local Contacts

- Feeding America www.feedingamerica.org
- State Priorities Partnership statepriorities.org/state-priorities-partners/
- USDA: Food and Nutrition Services Regional Offices www.fns.usda.gov/fns-regional-offices
- USDA SNAP Application and Local Office Locator
www.fns.usda.gov/snap/snap-application-and-local-office-locators

FOOD POLICY COUNCILS AND SNAP

SNAP, Food Insecurity and Local Government Funding

TEXAS

The *Austin Travis County Food Policy Board* has traveled around a block or two of Austin to understand the needs of food insecure families in the self-proclaimed Live Music Capital. Research by the Board's Food Security Working Group showed that a little over half of eligible persons in Travis County participated in SNAP. To address this low participation rate, the Board submitted recommendations to the Austin City Council and the Travis County Commissioners Court to fund a position devoted to SNAP outreach and

enrollment, an outreach campaign aimed at raising awareness about SNAP, and to establish EBT systems and incentive programs for SNAP recipients at area farmers markets and farm stands.²¹ As a result of the Board's research and meeting with individual councilmembers and commissioners, both the Austin City Council and the Travis County Commissioners Court approved funding for the Board's recommendations for two consecutive years.

21. http://www.austintexas.gov/sites/default/files/files/Health/SustainableFood/Recommendation__20140512-7D.pdf

State Administration

MARYLAND

In some states, SNAP benefits issuance to recipients is spread across the month. In others, every recipient receives their benefits on the same day. In Maryland, SNAP benefits were issued over a ten-day period, which was putting a strain on food retailers, particularly retailers in underserved areas. Issuance of SNAP benefits within a limited time frame causes a spike in demand for products, making it challenging for retailers to maintain adequate stock. Retailers also need additional staff to stock and serve customers during this temporary increase in demand, but cannot offer full-time employment during the slower times of the month. This spike in sales followed by inconsistent and slower sales for the remainder of a month places a financial and human resources strain on food retailers. To address this pattern of instability, the Food Policy Director for the *City of Baltimore Food Policy Initiative* worked with the Maryland Health and Social

Services department and other Baltimore City officials to stagger the issuance period of SNAP benefits over 20 days in a month. Staggering the release date ensures a steady income for retailers and helps them to maintain a consistent stock of perishable products, like fresh produce.

MASSACHUSETTS

The *Cambridge Food and Fitness Policy Council* is blazing a novel funding path to support a SNAP dollar match program at farmers markets. The SNAP Match Coalition established by the Cambridge Food and Fitness Policy Council and Cambridge in Motion is a group of farmers markets, public health and hunger relief advocates and city planners working collectively together to raise funds to support the SNAP dollar match program. The strength of this Coalition is that members fundraise as a team to supple-

ment their individual fundraising efforts. The Coalition relies on grant writing and an extensive crowd funding campaign paired with broad community outreach to drum up financial support, awareness and participation in the program. To measure the impact of these efforts, member farmers markets in the Coalition track SNAP usage through routine data collection. This model enables the Coalition to offer families \$15 extra to spend with their SNAP benefits at the farmers markets.

MONTANA

For the *Community Food and Agriculture Coalition* in Missoula, Montana supporting local farmers goes hand-in-hand with supporting families that receive SNAP. The Coalition is working to expand opportunities for families with SNAP to purchase local produce by EBT cards at a variety of retail venues, doubling the value of SNAP benefits, and engaging SNAP recipients as advocates for these programs. SNAP EBT is accepted at two farmers markets, a local food cooperative and for a community supported agriculture (CSA) program. In 2015, the Coalition, in partnership with the North Missoula Community Development Corporation, Missoula Community Food Cooperative, Clark Fork Market, Missoula Farmers' Market, and Western Montana Growers' Cooperative, began a program to double the value of SNAP benefits. Families using SNAP can receive up to \$20 extra to use at the farmers markets and food cooperative and up to \$200 to participate in the CSA. The Coalition recently launched a new grassroots marketing and civic engagement initiative informed by SNAP recipients. The initiative combines research from focus groups and surveys to hear from SNAP recipients about

their impressions of the double SNAP dollars program with community outreach led by SNAP recipients to educate their peers and community about opportunities to use SNAP to purchase local produce. From the focus groups, the Coalition learned that the bus system and a cap on the amount of double SNAP dollars at each market were causing some families to miss out on doubling the value of their SNAP benefits. In response, the Coalition is removing the cap on the availability of double SNAP dollars at the markets. For the Coalition, the individuals that use SNAP are the best ambassadors for the program.

MINNESOTA

Ensuring all Minnesotans have healthy, affordable, and safe food is the central goal to the *Minnesota Food Charter*. The result of a two-year public input process, the Food Charter is a roadmap for state agencies, local food councils, legislators, educators, and businesses to make long-term, systems changes to improve healthy food access. To track and ensure successful implementation of the strategies outlined in the Charter, the Minnesota Food Charter Network was formed in concert with the Minnesota Food Charter. The Minnesota Food Charter Network is supported by the Center for Prevention at Blue Cross and Blue Shield of Minnesota, the Minnesota Department of Agriculture, the Minnesota Department of Health, the Minnesota Department of Human Services, the University of Minnesota Extension and a host of other organizations. In addition to this unique combination of support from a healthcare provider, three state agencies and a university Extension program, the Network is also able to leverage SNAP-Ed funds in creative ways. As fiscal and organizational host, the University of Minnesota Healthy Foods, Healthy Lives Institute is putting some of its SNAP-Ed funding toward helping to support staff and work team members within the Network. The University of Minnesota Extension Health and

Nutrition program, one of Minnesota's SNAP-Ed implementing agencies, fulfills the role of community engagement for the Minnesota Food Charter Network. In this role for the Network, Extension provides technical assistance to local food councils and other projects to align with the Food Charter strategies. In 2015, Extension also provided funding to 15 agencies through SNAP-Ed Community Partnership Funding for policy, systems and environmental change in communities. This funding has been used, for example, to set up EBT systems to accept SNAP at farmers markets, to establish a food garden program on public land, and to provide capacity building assistance to local food councils.