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A COMMUNITY-DRIVEN ANTI-RACIST VISION FOR SNAP

CLASP
The Center for Law and Social Policy

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THE COMMUNITY PARTNERSHIP GROUP

The Community Partnership Group (CPG) is a diverse collective of activists from across the United States who partner with nonprofits, administering agencies, and policymakers to ensure that their work is grounded in the expertise of people directly impacted by poverty and/or anti-poverty policies (e.g., the Supplemental Nutrition Assistance Program or SNAP). Each member of the CPG has developed their expertise through direct experience with public benefits programs—whether through participation or discriminatory exclusion—and their ongoing advocacy to eliminate poverty and barriers to access and inclusion within their communities. The CPG was convened by independent consultants and staff on the income and work supports team at CLASP with an aim of dismantling the transactional and often traumatizing relationship between people with lived experiences of poverty and the government agencies and non-profit partners designed to support them. To read more about the CPG and the co-authors, visit www.clasp.org/cpg.

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EXECUTIVE SUMMARY

Public benefits such as the Supplemental Nutrition Assistance Program (SNAP) provide critical care and support for families with low incomes. However, they also reinforce structures of oppression. Historical context shows “welfare reform” in America is rooted in anti-Blackness, xenophobia, and other forms of racism. False racist narratives have left an ingrained mark on the system of public benefits and disproportionately affect communities of color with low incomes.

Our public policies far too often focus on scrutinizing individual people experiencing poverty rather than identifying systemic barriers, the root causes of poverty, and solutions for ending poverty. This report offers recommendations for changes to the SNAP program that move it in an anti-racist direction. This includes examining issues around sufficiency; availability; trauma; trust; respect; promotion of opportunity; and the perspectives of participants. By rejecting racist assumptions and not limiting ourselves to what is politically possible today, we can envision a program that truly centers what people with low incomes, of all races and ethnicities, need.

This paper was written as a partnership between CLASP staff and people with direct lived experience of poverty who are members of the Community Partnership Group.

To Meet the Need, SNAP Benefits Must Be Sufficient

SNAP must offer benefits that are adequate enough to provide healthy meals and allow people to purchase food that honors varied cultures. This includes considering special diets that cost more.

Addressing the need for sufficiency will require that SNAP administrators make the necessary adjustments to meet the needs of all recipients. Those adjustments must include defending the improvement to the Thrifty Food Plan, increasing overall benefit levels, improving deductions that SNAP recipients can take to increase their benefits, ensuring that all the food plans include culturally appropriate foods and spices, and expanding farmer’s market benefits to all grocery stores for fresh fruits and vegetables.

SNAP Must Be Available to All Who Need It

Making the program available and accessible to all who need it is essential. But it requires SNAP administrators to make changes to SNAP rules that are currently restrictive and block access to benefits for many potential recipients.

Those changes must include removing the five-year bar for qualified immigrants, making SNAP available to residents in Puerto Rico, removing the ban on SNAP benefits to people with prior drug felony convictions, and lifting restrictions like work requirements.

Using A Trauma-Informed Lens to Better Meet the Needs of Recipients

State Administrators of SNAP and other public benefits programs must train workers in trauma-informed services. This includes recognizing that people are not stereotypes – they are human beings who deserve respect, trust, and kindness. Administrators should use feedback loops to gather input directly from SNAP recipients on the agency’s effectiveness, its customer service, and asset-based language. They should conduct mandatory and ongoing unconscious bias training for workers in their agency.

Trust and Respect in The Application/Renewal Process

Increasing trust and confidence in the application and renewal process for recipients means getting rid of the administrative barriers that make it more difficult for people to apply for or renew their SNAP benefits. This should include less frequent renewals, elimination of unnecessary verifications, and a more simplified application process.

Trust and Respect from Policymakers on The Use of SNAP Benefits

To demonstrate trust and respect in SNAP recipients who are fully capable of making the best choices for their families, legislators must lift the restrictions on prepared foods, better support online purchasing by mandating free delivery for SNAP recipients, and take away the stigma attached to EBT cards.

Promote Opportunity Among Recipients

Administrators and policymakers should use strategies that provide access to greater opportunities for education, better jobs, and supportive services. Voluntary Employment and Training (E&T) programs help to connect people to high-quality jobs. Raising the gross income limit, eliminating asset limits for all, and mandating a simplified self-employment deduction are ways that administrators and policymakers can better promote opportunity within the SNAP program.

Value SNAP Participant's Perspective

In all dimensions of the SNAP program, what matters is the feedback and consultation with community members who receive SNAP. Administrators must acknowledge and incorporate the important perspectives that comes from those who are directly impacted by the program. States should seek advice from participants on program design, effectiveness, and evaluation. They should track and report on customer satisfaction, and be required to meet face to face rather than just surveying them.

Taken together, these recommendations can make substantive changes to SNAP, helping to redress the racist underpinnings of the program. These critical changes are necessary to move SNAP toward becoming an anti-racist program.



INTRODUCTION

The Supplemental Nutrition Assistance Program (SNAP) is the most important anti-hunger program in the United States. In 2021, the program helped an average of 41 million people experiencing poverty afford to put food on their tables each month.¹ SNAP provides important nutritional support for diverse groups of people, including working families, older adults 60 years and above, and people with disabilities living on fixed incomes.

Unlike many other means-tested programs, SNAP is not just available to households with children, although as many as two-thirds of SNAP participants are in a household with children.² Nutrition assistance is vital for childhood development. Lack of a balanced diet can have adverse effects on children, leading to long-term health problems and complications. It can cause unhealthy diets and decrease cognitive function in children and prevent them from fully participating in the educational system. Alternatively, access to SNAP leads to better overall health, educational, and economic outcomes.³ When policymakers support programs that provide adequate nutritional benefits and remove restrictions to these programs, it helps create better outcomes for children, parents, and the elderly.

RACIST HISTORY OF THE SNAP PROGRAM

Public benefits programs such as SNAP provide critical care and support for families with low incomes. Because of long-lasting patterns of social and economic oppression and discrimination, people of color disproportionately have low incomes. And yet, even with SNAP and other means-tested programs in place, Black and Hispanic households have reported consistently high rates of food insecurity over the past two decades, at least twice the levels reported by white households.⁴

“Politicians and the legislation they craft have focused too narrowly on individual people experiencing poverty rather than identifying systemic barriers, root causes of poverty, and systemic solutions for ending it.”

Historical context shows anti-poverty policy in America is intertwined with anti-Blackness, xenophobia, and other forms of racism.⁵ False racist narratives have left an ingrained mark on the system of public benefits and disproportionately affect low-income communities of color. Politicians and the legislation they craft have focused too narrowly on individual people experiencing poverty rather than identifying systemic barriers, root causes of poverty, and systemic solutions for ending it. Even as public benefit programs mitigate the hardships caused by economic and social exclusion, they also reinforce the underlying structures of oppression.

In the United States, the false belief of “undeserving” and “deserving” poor originated in Elizabethan-era Poor Laws,⁶ but the binary was further racialized and cemented by slavery. Both these laws, and the caste systems they created, claimed that poverty was a “personal choice,” not a result of misfortune, classism, or racism. The primary intent of this structural belief was to

maintain social order by giving people just enough that they don't rebel, but not too much that they stay dependent. Also, this structural belief was manufactured to preserve landowning white power, while politicizing poor whiteness. Slavery had no real benefit to whites experiencing poverty in the South. Slavery deprived lower-class whites of gainful employment and depressed wages for those fortunate enough to find work. The rapidly expanding disparity in wealth between the slaveholding elite and Southern poor whites created a permanent underclass oppressed by the institution of slavery.⁷ Consequently, as lower-class whites became more vocal about their discontentment for slavery and the predicament it placed them in, slaveholders employed various strategies. These included the withholding of education, monitoring of visitors who might bring abolitionist views, and more to manipulate Southern whites experiencing poverty into being tools used by slaveholders and Southern legislators to favor their agenda – even if it was against the very needs of Southern whites experiencing poverty at the time.⁸ In many ways, these tactics and techniques are still employed today. Although Southern whites living in poverty were experiencing hardships based on the existence of slavery, they were made to believe they were better and more deserving because they were still white.

For generations, Black people – particularly Black women – have been the target of harmful racist tropes that restrict their access to government supports. Anti-Black images such as the “mammy” and “jezebel” that originated during the time of enslavement labeled Black people as biologically inferior to white people and inherently lazy, promiscuous, and irrational.⁹ White enslavers used these toxic narratives to justify and utilize forced reproduction and labor to exploit, control, and punish enslaved Black women while maximizing their economic returns.¹⁰ As a racialized system of forced labor, slavery paved the way for more recent work requirements by promulgating an exceptionally narrow definition of work and popularizing stereotypes of Black people to justify their forced labor for more than 200 years.¹¹

Despite the reality that Black people have worked more than any other racial group in this country,¹² their work ethic has been constantly called into question. This harmful myth contributed to the Franklin D. Roosevelt Administration's deliberate exclusion of Black people from New Deal-era policies, which created our modern public benefits programs and elevated many low-income white people into the middle class.¹³ For example, Southern states sometimes restricted access to benefits during harvesting seasons to effectively coerce poor, Black families into working in the fields as sharecroppers at whatever wages were offered. *Anderson v. Burson* successfully challenged Georgia's policy of cutting all “able-bodied Negro women” off welfare at cotton-picking time.¹⁴ Even after the Civil Rights movement and series of federal policies rejecting discrimination against African-Americans, anti-Black policies took on covert and/or “race-neutral” language as false narratives like the “Welfare Queen”¹⁵ were spewed during Ronald Regan's presidency in the 1980s and also through Bill Clinton's quest to end “welfare as we know it”¹⁶ in the 1990s.

Today, anti-Black and classist themes are still reflected in many public benefits policies – always at the expense of Black women and other people of color.¹⁷ The seemingly “race neutral” dismantling over time of public benefits programs, such as SNAP, and the implementation of

punitive policies hurt everyone, but these actions carry disproportionate consequences for people of color. This paper will explore solutions that, if made by Congress and the U.S. Department of Agriculture's Food and Nutrition Services (FNS), will help to move the program in a more anti-racist direction to better meet the needs of people of color experiencing poverty.



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MAKING SNAP SUFFICIENT TO MEET THE NEEDS OF COMMUNITIES

Although SNAP demonstrably reduces hunger and deep poverty,¹⁸ the program must increase its sufficiency to better meet the needs of people of color experiencing poverty. Increased sufficiency means changing program rules to allow people to purchase food that is culturally affirming, provide enough SNAP benefits to purchase nutritional ingredients and/or healthy meals, and consider special dietary needs that may be costly.

Base benefits on low-cost or moderate-cost food plan

The U.S. Department of Agriculture (USDA) has four basic food plans used to give consumers the basic guidelines of a healthy diet.¹⁹ The thrifty food plan (TFP) is the lowest-level food plan. The next one is the low-cost food plan, followed by the moderate-cost food plan, and then the liberal plan. Last year, USDA re-evaluated the TFP,²⁰ which resulted in an average 27 percent increase in SNAP benefits, or roughly \$36 per recipient per month. Modernizing the TFP was a necessary step on the journey to increase SNAP benefits, and advocates must defend this change.²¹ However, to further reflect the realities of the cost of food today, policymakers must increase SNAP maximum benefit levels to reflect the low-cost or moderate-cost food plan.

Historically, anti-hunger advocates have encouraged the USDA to increase SNAP benefits to reflect the low-cost food plan. With the recent spikes in the cost of food based on the COVID-19 pandemic, FNS should also evaluate basing SNAP benefits on the moderate-cost food plan. The rise in food costs around the world driven by global supply chain problems and the war in Ukraine has raised concerns over the potential for another global food crisis that would increase hunger and possibly social unrest.²² Another challenge awaits when the U.S. Department of Health and Human Services declares that the current COVID public health emergency is over, which will end the Emergency Allotments that have boosted SNAP benefits since early in the pandemic.²³ In times of high inflation, the SNAP program should adjust benefit levels more than just one time a year. Whichever food plan the SNAP program reevaluates next needs to reflect the current economy, cost of living, cost of food, the time it takes to cook it, diverse dietary needs, adequate transportation, and food apartheid²⁴ where access to healthy and affordable food is limited.²⁵

The SNAP program should consider diverse dietary needs

Currently, Eurocentric foods are used as the standard for determining a healthy balanced diet. As a result, a plethora of cultural foods for communities of color are not considered – or worse are stereotyped as “unhealthy.” The reality is that Eurocentric foods are not necessarily healthier than those of other cultures. When FNS reevaluates the next SNAP food plan, administrators must seriously evaluate how to accurately reflect the average cost of foods, spices, herbs, and more. They should consider increasing benefits for people with specific dietary restrictions as well. For example, about 75 to 95 percent of African and American Ethnicities suffer from lactose intolerance.²⁶ Plant-based milks are often much more expensive than regular milk. To move the SNAP program toward being anti-racist, the program must evaluate how it can end food

apartheid²⁷ and contribute to food sovereignty,²⁸ which is the right of all people to have a say in how their food is grown and the right to fresh, affordable, and culturally appropriate food. The SNAP program must also include the voices of people with lived experience from diverse cultures to help design an inclusive food plan that meets the needs of all recipients.

Nutrition policing blames SNAP recipients for structural issues

Adequate access to food is economic justice. But too many people with low incomes are forced to stretch their SNAP benefits that are already so meager they don't cover the cost of food. In 2021, even after the revaluation of TFP, the SNAP benefit per person per meal is only \$1.87 – not enough to pay for a gallon of milk, which is about \$4.40 due to inflation.²⁹ Unfortunately, there is a narrative that folks receiving SNAP aren't well-educated on healthy food choices. The harsh reality is that they often cannot afford healthy foods. As a result, people experiencing poverty frequently must be crafty at creating well-balanced meals because overly processed, salty, or sugary foods tend to be fairly cheap. Studies in 10 countries found that unhealthy food is about \$1.50 cheaper per day than healthy food. When tasked with feeding a large family, parents often find it costs less to purchase cheap pre-made frozen dinners, cheap grains, fast food from the dollar menu, or other processed foods.³⁰ The current meager benefit levels don't allow folks to purchase healthier foods over a sustained period of time especially near the end of the month when they start to run out of benefits. Consequently, many people are forced to stretch their meals and incorporate low nutrition but high-volume foods like ramen noodles, instant potatoes, to feel full.

Furthermore, people of color often live in neighborhoods impacted by food deserts and food apartheid, where access to healthy and affordable food is limited. According to a study conducted by researchers at Johns Hopkins University, Black communities had the fewest supermarkets while white communities had the most, and multiracial communities fell in the middle.³¹ Grocery store chains are less likely to invest in new locations where there is a lack of public transportation and/or a large number of dollar stores, convenience stores and fast food. This perceived risk of investment, which creates food apartheid in communities of color, is grounded in racist assumptions about the purchasing power or foodways³² of other cultures. Dollar stores are overwhelmingly concentrated in communities of color; they often undercut traditional grocery stores, while selling very little if any perishable or non-processed foods.³³

Shelters for people experiencing homelessness, prisons, and residential treatment shelters for people with substance abuse disorders offer another example of a system that doesn't allow folks to purchase or eat healthy foods. These programs sometimes take people's SNAP benefits to help pay for the facilities' services. In exchange, the shelter serves residents unhealthy and heavily processed TV dinners. Residents aren't allowed to keep any fresh food and are only allowed to bring fast food or other processed foods into the shelter that can be kept without refrigeration. This example clearly illustrates how crafting a nutritional diet isn't about ignorance or the inability to make good food choices – it's determined by systems and a person's inability or ability to access healthy foods.

An additional example is the Food Distribution Program on Indian Reservations Program (FDPIR), which is a commodity-based program that serves primarily Native Americans on or near reservations. Families who are eligible for the program are not able to simultaneously get SNAP – even though the majority of the food offered under FDPIR is heavily processed canned food with very few frozen and fresh options. Although some food is being provided, the options are not nutritious. The rate of diabetes³⁴ and heart disease³⁵ in these Native communities is high, and community members believe these health conditions are linked to the packaged food provided by the program.

Based on the available resources and access to healthy foods, people often must make difficult choices.

Instead of creating programs around people's personal food choices or insinuating that a less nutritional diet is an individual failing, SNAP must confront the systems that deny Black, Brown, Indigenous, and many immigrant people access to healthy, affordable food. When people experience nutrition restrictions and limited options, they aren't making bad dietary choices, they are simply doing their best to survive. SNAP and all other nutritional assistance programs should value personal agency in making viable food choices for oneself and their family as an additional qualification of a successful program.

Expand bonus funds for access to fruits and vegetables

The importance of nutrition and healthy eating are constantly mentioned by Congress, other legislators, and anti-hunger organizations. Yet fruits and vegetables are designated as “specialty crops” and therefore are not subsidized at the same level as corn crops³⁶ – a commodity that’s used in many processed foods and has a powerful lobby in Washington, D.C. Fruits and vegetables are therefore more expensive than the processed and unhealthy food products that use corn crops.³⁷ Ignoring this systemic issue has made the conversation about nutrition into one that’s paternalistic. For example, people of financial means are viewed as “indulging a guilty pleasure” if they eat chips or other snacks deemed unhealthy, but SNAP recipients who do the same are viewed as being ignorant to the importance of nutrition.

The SNAP program offers a farmers’ market incentive where SNAP recipients receive double purchasing power when they use their SNAP dollars at farmers’ markets. Although this additional assistance has great potential, it does not benefit SNAP recipients who live in areas without strong local farming economies and who have easy access to farmers’ markets or cooperatives. For example, the farmers’ market in Medford, Massachusetts, opens for the season on June 9 and is only open from 3:00 to 7:00 pm on Thursdays. To access it, most people have to take a bus and then walk a quarter of a mile. How does this benefit help people who work during the hours of 3:00-7:00 on a Thursday? How does this benefit help people in the months preceding June 9, and after October 13, when it closes for the season? How does this help people who live in cities or towns where there isn’t a farmers’ market? To truly ensure that SNAP recipients have access to more fresh fruits and vegetables, the benefit of double purchasing power should also be accessible at grocery stores – and not be limited to a seasonal option for a select few. This would

reflect the reality of today's economy, maximize people's ability to access food, and reinforce personal agency.

Improve SNAP deductions

Another recommendation for increasing SNAP benefit levels is to revise and add more allowable deductions in determining the benefit amount. Currently, the SNAP program expects people receiving benefits to spend 30 percent of their available (or "net") income on food, so recipients receive the difference between that amount and the maximum benefit for their family size. The SNAP program takes into account certain expenses such as child care, mortgage, rent and utilities, or child support paid to another household when calculating applicant's income. In addition, every household receives a standard deduction for general unavoidable expenses and 20 percent of earned income is disregarded to cover taxes and work expenses. However, some of these deductions are capped or only available to households with seniors and disabled members, and other major expenses are not reflected at all.

To improve overall SNAP benefit levels, any deduction that has a capped amount should increase its cap to reflect the realities of today's costs of living. For example, the excess shelter deduction is capped at \$597 unless someone in the household is elderly or disabled. However, this country has a huge affordable housing shortage, and the average rent was just estimated at \$2,000 nationally.^{38 39} Many people experiencing poverty are paying well over half of their income toward housing.⁴⁰ To address this deficit, the SNAP program's deductions should be increased to reflect more accurately the current cost of living. Due to rising costs for practically everything, SNAP is not just an aid or supplement – sometimes it is all people have to put food on the table.

With student loan payments being such a burden, FNS should also consider making student debt an allowable deduction. In fact, approximately 43.4 million Americans have some form of student loan debt, with the average amount at a staggering \$37,014 – at least before the promised debt cancellation program recently announced by the Biden Administration.⁴¹ More specifically, Black and African American student borrowers are the most likely to struggle financially due to student loan debt, with 29 percent making monthly payments of \$350 or more.⁴² Households that had an income of less than \$40,000 made up 87 percent of the people who defaulted on their student loans within 12 years of enrolling in college, as of 2017. Education is generally a gateway to greater access to resources and money; however, people of color experience barriers to accessing better jobs, living circumstances, and resources. Consequently, many people who have attained an education and are paying student loan debt have not yet been able to successfully see the monetary fruits of their labor. Simply put, the SNAP program must include student loan debt as an allowable expense to accurately reflect the cost of a SNAP household's monthly bills.

SNAP SHOULD BE AVAILABLE TO ALL WHO NEED IT

SNAP is a critical support for those who have difficulty purchasing food. However, eligibility rules at the federal and state level explicitly deny or restrict access to SNAP for

- people with a drug felony on their record,
- some college students,
- unemployed people 18-49 who don't have a child in the home, or documented disability
- people with a documented disability or job,
- some immigrants,
- Residents of Puerto Rico
- Native Americans, and
- more.

Arbitrary rules pertaining to immigrant bans, work requirements, and other barriers to enrollment are grounded in racist and xenophobic stereotypes. Other people are eligible but unable to access the SNAP benefits they are entitled to because of administrative hurdles, stigma, or a failure to communicate information. All arbitrary barriers to accessing SNAP lead to food insecurity and should be removed.

People excluded by the labor market. Under an overhaul to public benefits programs enacted by a 1996 law, receipt of SNAP is limited to just 3 months out of every 3 years for most working-age (18-49) adults without minor children living with them, unless they have a documented disability or report 20 hours of work or related activities each week. This population is referred to in SNAP regulations as “Able-Bodied Adults without Dependents” or “ABAWDs.” This policy cuts off hundreds of thousands of unemployed people from food assistance when they need it most. And it’s a policy that disproportionately affects people of color who are already discriminated against in the labor market, have higher rates of unemployment, and are more likely to be employed in part-time jobs with highly variable hours of work. The phenomenon of racial bias in health care also impedes access to SNAP when the ability of people to receive exemptions based on health conditions is limited by well-documented bias⁴³ in pain assessment and treatment recommendations.

Immigrants. Since 1996, federal law bars most adult immigrants from receiving SNAP for five years after they get their green cards. Refugees and asylees are not subject to this waiting period. In addition, individuals with Deferred Action for Childhood Arrivals (DACA) status or Temporary Protected Status (TPS) are excluded from accessing federal benefits entirely, despite also being lawfully present immigrants. Children are not subject to the five-year bar, and eligible children can receive SNAP benefits even if their parents are subject to the bar or are undocumented. However, confusion over these restrictions has also led to many children in mixed-immigration-status families not receiving SNAP, even though they are eligible. The five-year bar must be eliminated.

Immigrants can be subject to malnutrition, disease, and even death if we accept them into our country without assessing their needs and ensuring those needs are met until they are stable. Otherwise eligible families and older immigrants are not allowed to apply for safety net programs that they could need, leaving them at risk of economic and food insecurity. Families with at least one immigrant parent experience persistently **higher levels of food insecurity** than families headed by native-born parents. That's why, in addition to lifting the five-year bar, FNS should make other improvements to ensure all people experiencing hunger, regardless of immigration status, are able to receive SNAP.

Residents of Puerto Rico. Puerto Rico has been a United States territory since 1917, and its residents are U.S. citizens. However, people living in Puerto Rico are not given the same food benefits as other Americans. Puerto Rico currently has a block grant program called the Nutrition Assistance Program (NAP) that is ineffective and fails to address food insecurity on the island. Because NAP's fixed level of funding does not meet the changing needs of the territory, America must take care of our residents by ending the ineffective block grant program and expanding SNAP to residents of Puerto Rico.

According to the Center on Budget and Policy Priorities (CBPP), NAP fails to meet the needs of people in times of economic hardships or natural disasters. Researchers at CBPP write, "The U.S. Department of Agriculture (USDA) determined in a comprehensive 2010 assessment that if Puerto Rico participated in SNAP, it would spend approximately 23 percent more on household food assistance as a result of serving more individuals and providing more robust benefits."⁴⁴ Providing more benefits decreases food insecurity and improves children's outcomes. Puerto Rico is a part of this country. Therefore, the federal government has a duty to provide the same services to the Puerto Rican people as it does to the continental United States.

Native Americans. Native Americans participate in the Food Distribution Program on Indian Reservations (FDPIR) if they are income-eligible and live on a federally recognized reservation. Rather than offering benefits through an EBT card like SNAP, FDPIR provides people with food acquired through the USDA, as described earlier. Although Native peoples are eligible for SNAP, they cannot participate in FDPIR and SNAP in the same month due to restrictions imposed by the federal government. Native American families are another marginalized group that, without restrictions, could benefit from participation in SNAP while simultaneously receiving FDPIR.

Victims of the War on Drugs. Individuals with prior felony convictions, incarcerated or not, often face "collateral consequences," which are significant barriers imposed in addition to their sentences that can range from being denied employment to losing voting rights. Some states subject people with a drug-related felony conviction to restrictions or complete bans on food assistance under SNAP. Federal law requires states to affirmatively pass a law to opt out of this SNAP ban for people with prior felony convictions. More than half of the states have recognized the harmful and counterproductive nature of these bans and have opted out, but more than 20 states – disproportionately in the South and Midwest – have retained at least a partial ban, and South Carolina continues to impose a total ban.

These bans make it more difficult for people with previous convictions to reintegrate into society, restore relationships with family members, and obtain employment. When people leave prison and re-enter the community, they experience barriers to accessing jobs and employment opportunities due to their records. Denying people access to nutrition assistance means serving a double punishment and could potentially lead to people getting involved in crime activities again if they are left to fend for themselves. Research shows that when we continue to deny people charged with felonies access to food and nutrition, we make it hard for them to re-enter society, which in turn contributes to inequities.

These exclusions are especially punitive for Black and Latinx communities due to the War on Drugs' uneven enforcement of drug laws and targeting of communities of color with low incomes. The over-policing of segregated neighborhoods has resulted in the conviction and incarceration of disproportionate numbers of Black and Latinx people, especially Black men.

A racially equitable SNAP program would lift this ban at the national level. States should also streamline the process of accessing SNAP benefits with minimal burden or delay upon reentry, which is a time when individuals face many other challenges.

And due to historical and economic racial inequities, students of color are disproportionately likely to have difficulty meeting their basic needs.⁴⁵ First-generation low-income students and don't get financial support from their families. Yet, SNAP rules limit college students' access to food assistance unless they work at least 20 hours per week, are caring for dependent children, or meet other exemptions. These rules are based on outdated stereotypes of college students as nutritionally secure and able to depend on their parents for any needed support. The Government Accountability Office (GAO) found that, in reality, nearly a third of undergraduate students are from households with incomes under 130 percent of poverty and have at least one other risk factor for food insecurity.⁴⁶ Even among those who meet the exemption criteria, many are unaware of their possible eligibility and do not receive needed assistance. Policymakers should eliminate counterproductive restrictions on college student access to SNAP.

Other access barriers. In addition to removing the explicit restrictions on eligibility, it is also important to remove softer barriers that prevent people who are eligible for benefits from receiving them. This includes making it easier for people to learn about the program, understand how to apply, and receive assistance in applying if they are eligible and could use the assistance. Removing administrative burdens and "hassle" in the application process is important both for improving access to benefits and for treating applicants with dignity. Administering agencies should update websites, training manuals, etc. to remove language that excludes people (e.g., removing references to recipients as "citizens" when non-citizens are also eligible and saying that "students aren't eligible for SNAP" when many may qualify for exemptions.) Agencies should also conduct outreach and education campaigns to remove the stigma of receiving help and address people's concerns that SNAP isn't meant for "people like them."

Eliminating barriers to access by immigrant and mixed-immigration-status families requires particular effort.⁴⁷ Within immigrant communities, many people have shied away from accessing public benefits due to intrusive questions on the forms and fears about whether use of benefits could impact the status of other household members. Federal agencies have worked to reduce the chilling effect of questions about immigration status on benefits applications in the past. In 2000, USDA and partner agencies within the U.S. Department of Health and Human Services issued a “Tri-Agency Guidance” document recommending that states delete questions from benefits applications forms that are unnecessary and that may chill participation by immigrant households. As reported by the National Immigrant Law Center (NILC), “The guidance confirms that only the immigration status of the applicant for benefits is relevant. It encourages states to allow family or household members who are not seeking benefits to be designated as non-applicants early in the application process.”⁴⁸ More outreach and publicity on these protections is needed, including in multiple languages.

FNS should hold states accountable for access. SNAP is supposed to be a national program, meaning it is 100 percent federally funded, has benefit levels set by the federal government, and can limit each state’s ability to add additional eligibility restrictions. Yet states have a great deal of power to either ease or barricade the process for eligible people to enroll. FNS estimates that in some states, close to 100 percent of those eligible for SNAP receive it, while in 21 states, less than 80 percent of those eligible actually receive it.⁴⁹

For FNS to truly hold states accountable for protecting and improving access to SNAP, the agency would have to monitor when states violate federal requirements and enforce consequences. These requirements include timely processing of applications, language access, the tri-agency guidance on information about non-citizens, and ensuring that recipients are not being pressured to waive their fair hearing rights. Processes that limit the number of applications an agency will accept in a day and that require people to line up for hours to be seen are inconsistent with federal rules and are racially biased if the capacity relative to need is lower in areas where more people of color live. Measures of program integrity should take people improperly denied benefits as seriously as those granted benefits in error. States should break out data on access and timeliness of service by racial and other demographic characteristics to identify populations who are being underserved.

TRAUMA-INFORMED CARE IN PUBLIC BENEFITS

Trauma affects the brain and behaviors of a person who has experienced a traumatic event. Survivors of trauma often feel like they are in a constant survivor mode. This may lead to impulsive behavior and decisions based on the short-term and immediate outcome versus forward thinking and planning ahead. For many years, trauma being an abnormal experience was a misconception. However, resources from the National Council on Behavioral Health find that over 70 percent of U.S. adults will experience some type of traumatic event at least once in their lives, which is equivalent to about 223.4 million people.⁵⁰ These can include:

- **Adverse childhood trauma:** Various forms of physical and emotional abuse, neglect, and household dysfunction experienced in childhood, which can occur as early as two months old due to lack of contact.
- **Psychological trauma:** Damage to a person's mind from one or more events that cause overwhelming amounts of stress, eventually leading to serious, long-term negative consequences.

Experiencing poverty, racism, discrimination, marginalization, and the many other consequences of economic insecurity in this country is often traumatizing. Public benefits provide essential support for families – often at difficult times in people’s lives when they are experiencing or have recently experienced trauma. Individuals who have experienced trauma face additional barriers that can hinder their participation in the public assistance system. Social determinants of health, poverty, and scarcity – including lack of resources, accessibility, and affordability – also contribute to an individual's trauma.

Too often, people seeking assistance are treated disrespectfully and assumed to be trying to get away with something, if not directly accused of fraud. This is bad for all applicants, but particularly bad for people with previous histories of trauma. Therefore, implementing care in SNAP and all public assistance programs that is informed by and address trauma could lead to a social safety net that genuinely serves, supports, and understands benefit recipients. A trauma-informed approach begins with understanding trauma's physical, social, and emotional impact on the individual, communities, and the professionals who help them. Adopting a trauma-informed method can improve outcomes for individual benefit recipients and overall program engagement. Utilizing trauma-informed care is vital because it will assist administrators with creating an environment where individuals receiving SNAP feel respected and cared for by the administering agency and their employees. In addition, this innovative approach focuses on the wellness of the participants and staff of the public assistance programs.

SNAP state agencies need to adopt an approach that has foundational core principles of collaboration, respect, empowerment, empathy, humility, transparency, responsiveness, safety, and support. For trauma-informed practices to be successful, they should be integrated into the agency's overall structure and workflow. Innovative changes should include:

- Ensuring transparent communication between leadership and staff about the transformation and implementation of trauma-informed care practices. A full commitment is needed to transform relationships and build an understanding of trauma and its effects on communities and individuals.
- Hiring a trauma-informed workforce or representative. This should include staff educating themselves and others on the necessity of trauma-informed care and sharing this knowledge widely.
- Providing ongoing training for staff and encouraging clients to complete frequent critical review surveys to access treatment, assure quality of service, and gauge compassion and

empathy fatigue.

- Integrating knowledge into the agency's policies, procedures, and practices – and revisiting old documents and changing the wording to asset-based language.
- Recognizing signs and symptoms of trauma in the communities the agencies serve and in their staff members.
- Actively resisting re-traumatization while uplifting dignity, respect, compassion, and empathy.
- Referring individuals who have experienced traumatic events to partnering organizations, therapy, counseling, and resources that support the restoration of a person's well-being.
- Preventing secondary traumatic stress in staff. This includes fostering a safe, healthy working environment that focuses on the well-being of the staff and clients.
- Recognizing that trauma is not always an individual situation and can be collective or a result of toxic systems, policies, and practices.

Acknowledging how trauma affects all individuals involved with the process or system – including its own workforce – is crucial to removing unconscious biases and barriers. For example, a person with lived experience may have feelings of distrust, hurt, discomfort, inferiority, anger, hopelessness, depression, and more. The goal of trauma-informed care is to safeguard against policies and practices that may inadvertently traumatize people. The holistic approach acknowledges a person's situation but does not allow their circumstances to define them.

TRUST AND RESPECT IN APPLICATION/RENEWAL PROCESS

Overall, states and the federal government should strive to increase confidence in the application and renewal process by removing as many barriers as possible and streamlining processes. In some states, the technology, computer programs, and workflows that agencies use have not been improved or updated in decades. For example, individuals are required to mail, fax, or leave paper copies of documents at a desk or drop box, simply having to trust that their information will make it to the necessary person. Misplacing or mislabeling paperwork can cause a family to lose their benefits. When caseworkers do not process paper documents quickly, some systems automatically terminate benefits for clients or generate notices asking for the same documents that have already been submitted. Even systems that are fully digital often have websites that are clunky for the individuals attempting to apply for benefits. In addition, not all communities have access to the internet, either because it is unaffordable or unreliable in their area.

SNAP recipients have limited time to apply for or recertify their benefits. At the same time, many people in jobs paying low wages have strict restrictions on how much time they can request off or receive an unqualified absence. Each time a SNAP recipient misses a shift or takes too long of a lunch break to turn in paperwork, they are at risk of losing their job. Miscommunications due to archaic technology, computer programs or databases, and workflows increase the time commitment of participating in SNAP and other benefits programs. Every hour and every dime counts for families because SNAP supplements low-wage work. Lastly, the way individuals are

greeted, treated, and supported through the process can affect whether or not they apply for benefits again when they need them.

When agencies update antiquated systems, officials must fully test them before launch to avoid confusion, errors, and delays in approving benefits. Each part of the new technology, program, or workflow should be tested by the person or team responsible for that system to ensure that the process is streamlined and efficient at rollout and that caseworkers have been fully trained in its use. All processes and workflows should incorporate human-centered design, and users should be paid to provide feedback, rather than treated as involuntary beta testers.

Eliminate the interview requirement, make certification periods longer, and reduce documentation requirements for verifying self-reported information

To demonstrate trust in applicants and recipients, the federal government should eliminate the interview requirement unless the application is incomplete or there is an objective reason to believe that the information is inaccurate (e.g., the information provided is meaningfully different from what was provided to another program or available from electronic data). Failure to complete the interview is one of the most common reasons why SNAP benefits are denied or delayed, and this failure frequently occurs because of reasons unrelated to the eligibility of the client (e.g., they do not receive the notice to schedule the interview in a timely basis; they have work, school, or other conflicts with the assigned time; or the eligibility worker does not call at the specified time).

Families must also bring anyone applying for the benefits into the office, which could include children, elderly, and/or disabled family members. This requirement can create hardship for applicants and their family members such as work absences or lost hours, children missing school, and transportation costs. Clients routinely report waiting hours on hold to reach benefit agencies to reschedule missed interviews or simply receiving notices that they are being denied before getting a chance to reschedule. Scheduling and conducting interviews are also hugely time consuming for state agencies, taking up time that could be used to provide better customer service. During the early period of the COVID pandemic, FNS granted blanket waivers of interview requirements, and there is no evidence that this resulted in higher error rates⁵¹. At a minimum, the interview requirement for recertifications should be removed.

Short certification periods are also a major driver of benefit loss and churn, as they create more situations where people can lose benefits. In general, the federal government requires annual recertifications, although the time period can be longer for certain households with seniors and people with disabilities who do not have earned income. However, states may require more frequent recertifications and /or interim reports. These short certification periods add burden and create more opportunities for human error, causing families to lose their benefits. One-year renewal periods – nothing less – should be the national standard.

Another major source of burden is verifications. The verification process involves providing documentation of earnings and – to qualify for some deductions – business expenses, child care

fees, housing costs including utilities, and medical expenses. States should use standardized expenses to minimize the paperwork required and allow applicants and recipients to report changes in employment status or expenses (under penalty of perjury) rather than bring in paperwork, which is a process known as “self-attestation.” For example, when someone is fired, their former boss may not be willing to fill out paperwork for them. Or when a company closes, there may be no way to reach someone who can fill out the documents. These are just two situations where self-attestation can streamline the process.

Several states currently have waivers for “Elderly Simplified Application Projects” that allow for longer certification periods (up to 36 months), waived recertification interviews, and simplified verification requirements for households where all members are seniors or disabled and have no earned income. These flexibilities recognize that some households have less frequent and smaller changes in their income; therefore, more frequent certifications are not needed. This population-specific program should become a national program, not a waiver that states must apply for. In addition, the federal government should consider launching similar pilots for other groups of people who are less likely to have changes in income or circumstances.⁵²

Providing eligibility workers with trainings

The federal government should establish standards for eligibility workers to make sure that states are appropriate training workers in all exemptions and deductions. Under-trained workers may fail to correctly identify exemptions to the student restrictions, or may not tell applicants about how to request an exemption from work requirements due to disability or domestic violence. Many states are currently experiencing very high worker turnover rates and requiring eligibility staff to carry large caseloads or shifting to call centers where the phones may not be answered by qualified caseworkers. All of these create higher likelihoods of error.

Standards should include cultural competency and anti-bias training. Other programs have such requirements; for example, cultural competency is required for Affordable Care Act (ACA) Navigators⁵³ who have less power over clients than SNAP eligibility workers do. Cultural competency and anti-bias training can begin to improve the interactions that eligibility workers have with their clients. Understanding other people’s cultures, as well as systemic and personal biases, is critical to caring for and serving diverse communities with low incomes. When government agencies require these trainings for their employees, it signals to clients that agencies are trying to evolve. It indicates that agencies understand that many eligibility workers are seeing clients in times of hardship or crisis. New staff should also be trained on how to respond to traumatic life events, particularly those that are dangerous or life-threatening (e.g., experiencing homelessness or domestic violence).

Evaluating agencies' treatment of recipients

Monitoring the right performance measures can expose fractures in the system. Data that the federal government should examine include:

- Time frames for application approvals, including the share of decisions made the same day the application is received and whether people who qualify for expedited approval are receiving it;
- Hold times and dropped calls in call centers, as well as in-person wait times; and
- Error rates, including improper denials as well as under- or overpayments, and the ratio of successful appeals and unsuccessful appeals.

Agencies should break out all data by race and other demographic information. In addition, federal oversight and monitoring of state performance should include communication with a random pool of end users regarding their overall experiences applying for benefits, including questions that assess if they felt treated with respect and dignity. For example, while details like whether there are enough chairs in a waiting room or toys for children to play with will not be captured in administrative data, it can have a big impact on whether people feel welcomed.

Confusion on eligibility criteria for immigrant communities

One of the biggest barriers in immigrant communities is the confusion on eligibility requirements when accessing public benefits. The intersection between immigration laws and welfare laws can be complex and hurt people who are in need. Moreover, these laws vary from state to state. Major differences in state and federal benefit offices contribute to this confusion. Adding to the confusion is that workers are not well trained to navigate the complex immigration questions on application forms and, in turn, may accidentally deny benefits to qualified immigrants. As a result, many immigrant families have shied away from accessing these benefits because they or a family member have been mistakenly told they don't qualify for them.

Language barriers

Many immigrants do not have English as a first language in their home countries, and a high percentage of these families speak a language other than English at home. Language can therefore become a barrier to access for families who qualify for SNAP. Most of these families who have limited English proficiency struggle to understand the forms provided or interpret the requirements without language assistance. Recipients of SNAP and other public benefits should not be discriminated against based on language proficiency or country of origin. Federal benefit offices are required to ensure they provide translation services to people who don't speak English proficiently, which would guarantee they have equal access to public benefits.

TRUST AND RESPECT IN USE OF BENEFITS

Hot foods

“Food is more than just a basic necessity; it is a human right.”⁵⁴

As explained in the previous section entitled "Racist History of the SNAP Program," public benefits programs require people to prove that they are "deserving" of assistance--that they are worthy of food. SNAP also restricts what types of foods recipients can purchase and when. The word "Supplemental" in SNAP implies that the benefit of \$5.20 a day, per person is meant to provide additional aid to people in purchasing food. In reality, however, SNAP is commonly the only means by which some people are able to purchase food, especially at a time when housing costs are greatly outpacing wages.⁵⁵

Another example of legislators inaccurately understanding how SNAP's function and purpose can affect the food products that SNAP recipients have access to is the disallowance of hot and prepared foods. Currently, the only way for SNAP recipients to purchase hot or prepared foods is through the restaurant meals program,⁵⁶ or if a disaster is declared, as was the case of the recent wildfires in New Mexico.⁵⁷ On its face, saying what adults are and aren't allowed to purchase to satiate their hunger is blatantly paternalistic. But disallowing SNAP recipients to purchase hot foods assumes that everyone has access to refrigeration, a working stove, or the time and resources to cook.

For example, Community Partnership Group member Maryann has a friend who experienced street homelessness for some time in New York City. The one thing this person consistently talked about was not being able as a SNAP recipient to purchase a hot bowl of soup in the dead of winter. Black and Indigenous people experience homelessness at higher rates than Whites, largely due to long-standing historical and structural racism.⁵⁸ Although Black people make up only 13 percent of the overall population, they comprise 39 percent of people experiencing homelessness and 50 percent of families who are homeless with children.⁵⁹ Another friend of hers who also lived in New York City in public housing with no working gas, meaning they couldn't use their stove and couldn't cook hot meals for their family for over a year.

We don't mention the stories because these individuals lack voice or personal agency or to share their stories solely as good talking points. Maryann chose to share these stories because these individuals don't have access to spaces like this report to share their knowledge and the insight they've gained from personal experiences. She decided to relay these insights because she recognizes the humanity of these folks. To see the policy change needed to end hunger in this country, where 40 percent of food is wasted every year,⁶⁰ policymakers need to create strategies in consultation and partnership with the people who live the disparate impacts of these policies

every day. If SNAP were designed in partnership with people experiencing homelessness or public housing's backlog of needed repairs, SNAP would not exclude hot, prepared foods.

Online purchasing

Since 2019, USDA has supported an online grocery purchasing pilot program for people using SNAP. Shoppers can use their Electronic Benefit Transfer (EBT) cards, which are like SNAP-issued debit cards, to buy groceries online through select stores. Due to the immediate need for expansion as grocery and convenience stores cut hours and reduced capacity to delay the spread of COVID-19, the program expanded to almost all 50 states in 2020. Originally, Amazon and Walmart were among the very few participating stores, but the pandemic prompted USDA to announce an expansion of allowable stores, including independently owned and operated retail stores. Online purchasing is a wonderful option for SNAP recipients, particularly for the elderly, as well as folks who have disabilities or transportation barriers. To make the program even better, the USDA should incorporate paying for delivery fees, which often prevent some SNAP recipients from participating in the online purchasing program based on their financial circumstances. Incorporating free delivery fees will open up greater access to food for SNAP recipients and, in turn, will improve the overall program.



PROMOTE OPPORTUNITY

Reforming SNAP E&T

The SNAP Employment and Training (E&T) program provides employment-related services to SNAP recipients. At its best, it provides SNAP recipients with access to high-quality training programs that lead to well-paying jobs and supportive services such as child care, transportation, tools, or uniforms that make it possible for them to seek, obtain, and keep jobs. But too many states run mandatory programs that act primarily as barriers to SNAP receipt or operate low-quality programs that serve to meet the work requirements imposed on ABAWDs but do little to improve the employment prospects of participants. Changes that can ensure the SNAP E&T program truly promotes opportunity include:

- Removing the state option to make E&T programs mandatory. The evidence is overwhelming that mandatory E&T programs do not increase employment or economic security; rather they simply act as a barrier to food access for people who are already marginalized in the labor market. Until this barrier is lifted, FNS should track and report information on the number and demographics (i.e., age, race-ethnicity, gender, etc.) of people sanctioned from SNAP due to work requirements.
- Implementing a more individualized approach in state agencies when screening and referring recipients to education and training programs. Individualized assessments can give caseworkers a snapshot of recipients' previous work experience and their hard and soft skills. From this information, caseworkers can make a comprehensive, tailored plan and refer people to programs that align with their strengths. Furthermore, plans should also consider labor market demands for the surrounding area.
- Assessing potential third-party partners more thoroughly to determine whether providers could be effective SNAP E&T partners. State agencies should seek organizations with work and learning environments that are progressive, safe, caring, and inclusive for all participants and employees.
- Changing current laws that disallow people from continuing to receive SNAP E&T funded services (other than job retention services) if they stop receiving SNAP benefits. This policy makes it risky for programs to partner with E&T, because they could stop receiving funding midway through the program. Congress should change the rules to allow students enrolled in college as part of a SNAP E&T program to continue receiving E&T-funded ancillary services until the end of the semester even if they leave SNAP for some reason. Similarly, participants in a training program should be able to complete the program.
- Disregarding income of participants in SNAP E&T and Workforce Innovation and Opportunity Act work-based learning so that they do not lose their SNAP benefits as a result of the wages they earn. Work-based learning was made an allowable SNAP E&T in

the last Farm Bill, but it is almost impossible for states to use this option, as most participants would quickly lose SNAP eligibility.

- Making state-level information on employment outcomes for SNAP E&T program available to the public. This data, which FNS currently requires states to report, should be disaggregated by program within E&T, as well as by race and other demographic information.

Aligning SNAP rules to the realities of people with low incomes

At the same time that SNAP E&T is supposed to promote employment, other aspects of the SNAP rules can make it harder for recipients to achieve economic stability through employment. FNS can address this by making changes that include:

- Raising the gross income limit nationally to prevent benefit cliffs as earnings rise. The federal gross income limit cuts off SNAP benefits completely when a household's income reaches 130 percent of the federal poverty level (FPL). For a parent with two children, this equates to an annual income of just \$28,550, or about \$16 per hour if working 35 hours a week year-round. This abrupt cut-off can create an economic "cliff effect," which occurs when a worker's relatively small pay raise results in a complete loss of benefits. This cliff effect can be especially harmful for people with high housing or child care expenses. As many as 39 states, including Guam and the District of Columbia, have recognized this problem and have used "broad-based categorical eligibility" (BBCE) to raise the gross income limit. However, 12 states have not, including 5 who have adopted BBCE but only used it to increase asset limits. The gross income limit should be raised to 200 percent of FPL nationally – this will allow SNAP benefits to decline gradually as income rises, without cliff effects.
- Similarly, the federal rules limit SNAP households to liquid assets of \$2,750 or less for most households, and \$4,250 or less for households with a member who is 60 or older or who has a disability. Liquid assets are the amount of money people have in their checking or savings accounts. Asset limits prevent households from saving. Without savings, temporary setbacks such as a short-term job loss, an unusually high utility bill during a cold snap, or a car breakdown can result in a downward spiral that sends families into debt. Asset limits also discriminate against renters, who are more likely to be Black or Latinx, because the value of an owned home is not counted – but savings for a deposit to make a move or a down payment is counted toward the asset limit. In 2022, the average monthly fair market rent for a two-bedroom apartment was around 1,480, meaning that savings at an amount that would cover the payment of first and last month's rent would be enough to push a family over the \$2,750 federal SNAP asset limit. And this limit would also restrict the ability to save for a down payment on a home. While many states have used broad-based categorical eligibility to raise or eliminate the SNAP asset limits, eight have not. Therefore, asset limits should be eliminated on a federal level.

- Eliminating the “birthday cliff” for working young adults by not counting their earnings against their family’s SNAP benefits. Currently, the income of students in SNAP households is disregarded through age 17 as long as the child is living at home and is in school at least part-time. However, as soon as that student turns 18, their income is now suddenly included in their family’s countable monthly income – causing an immediate decline in SNAP benefits for the entire family. The income of full-time students (in high school and postsecondary education) who are included in their parents’ household should be disregarded until at least age 22.
- Mandating simplified self-employment deduction. With the rise of the “gig economy,” the number of SNAP recipients reporting self-employment income nearly tripled between 2006 and 2018. Black and Hispanic workers are far more likely than white workers to report earning money through online gig platforms. Many may not be getting the full amount they should qualify for because of the burden of reporting expenses related to self-employment. For example, someone who uses their own car to drive for Uber or DoorDash would look like they were making far more than they actually are if they do not accurately track their gas, toll, and maintenance costs. Nearly half the states have adopted a simplified approach for calculating self-employment expenses – this should be a national standard.

VALUE THE PARTICIPANT PERSPECTIVE

The ability of USDA, FNS, and all state or local agencies that administer SNAP to meaningfully engage with participants and eligible people is imperative to moving the program in an anti-racist direction.

Start with internal reflection and learning

Before beginning relationships with community members, agencies must first acknowledge and research the racist history of federal policies and their local implementation that have historically traumatized people experiencing poverty—particularly people of color. Every benefit program’s policies, rules, processes, and operations have been shaped by systemic racism. Consequently, as power-holding stakeholders like SNAP administrators plan to engage with people deeply impacted by poverty, they should seek training to better understand the impact of systemic racism, implicit bias, and white supremacy on people experiencing poverty and the communities they represent.⁶¹ Agency workers should also attend trainings to better understand the value that people with lived experience bring to conversations about policy and systems change. Agencies can begin to build trust within communities of color after learning the history of public benefits – including the racist stereotypes ascribed to Black, brown, and immigrant recipients and the rules created to exclude them – and practicing how to work in partnership with SNAP recipients.

Investing in community-based organizations and members

Ideally, community-based organizations, which often catalog local histories and experiences and have earned community trust, can be stronger partners in opening lines of dialogue between agencies and the people directly impacted by the policies they administer.⁶² It is critical that agencies seek out partnerships with and provide adequate passthrough funding to organizations that are led by Black, Indigenous, Latinx, Asian American, Native Hawaiian, and Pacific Islander (AA&NHPI), LGBTQ+, and immigrant people – and that support communities when the federal government and administering agencies fail to do so. Agencies should enter and participate in these partnerships with humility rather than transactionally, as if communities owe the governments something. Once the relationship between administrators and community members has been built, agencies can formalize the working relationship by developing sustainable engagement models such as advisory boards. Eligibility workers, caseworkers, and agency officials can then consult this organized group of community members on questions related to program design, implementation, and evaluation.

It is important to recognize the value of the expertise of program participants and to pay them for their time and expertise, as well as to reimburse them for any costs incurred in participating (transportation, child care, meals). FNS should provide states with clear guidance that this is an acceptable use of SNAP administrative funds, and grant waivers allowing such payments to be excluded from SNAP income. If state policies or legislation restrict such payments, they should be changed, as was recently done in Washington State.⁶³

Opportunities for state agencies to enhance engagement with communities of color

Community leaders can serve as a bridge when reaching out to communities of color or people who are marginalized. Many communities experiencing poverty have been taken advantage of for a very long time by systems and power structures, which makes it difficult to build trust. If a state agency wants to improve engagement with immigrant populations, they must go into those communities and work with existing grassroots organizations that community members trust.

State agencies should also consider contracting with community-based organizations that serve immigrant populations by, for instance, providing English lessons and free translation services – skills that could also assist people in applying for public benefits. State agencies don't always need to go into the communities – they can provide the needed information to community partners and let them disseminate it to reach more people.

Feedback loops

Government agencies have a responsibility to ensure that they're providing services that match and meet the needs of the communities. One underutilized tool in this process is feedback loops, which include collecting insights from end users to improve products and services. Typically, the people who are receiving these services are the experts on defining how effective and useful the services are. Without gathering feedback from users, federal and state agencies set themselves up

to fail by repeating the same mistakes or ignoring improvements that could be life-changing to the communities they serve. State agencies should be encouraged to take customer complaints seriously by discussing them internally and strategizing how the agency can proactively address those complaints.

Closing the loops is equally important. Often, organizations spend a huge amount of time gathering insights and public input and then move to the next stage of drafting a plan without engaging the participants or even letting them know how their feedback is being incorporated in designing new outcomes. Lack of engagement throughout the process can contribute to distrust since communities that have been marginalized have a history of being taken advantage of when agencies or organizations use their stories without acknowledgement. The goal for feedback loops should ultimately be to build stronger relationships with communities and ensure that the services being offered are useful and meet their needs.

CONCLUSION

The SNAP program has helped to put food on millions of tables. Yet, administrators can improve the program in multiple ways to become equitable. One of the undeniable tensions with SNAP is whether – given its racist history – it can become completely anti-racist. Anti-racism is defined as a process of actively identifying and opposing racism. The goal of anti-racism is to challenge racism and actively change the policies, behaviors, and beliefs that perpetuate racist ideas and actions.⁶⁴

Anti-racism is rooted in action and requires taking steps to eliminate racism at the individual, institutional, and structural levels. This paper's recommendations will absolutely move the program toward anti-racism. For the program to be completely anti-racist, however, policymakers and administrators need to boldly reimagine the program starting with visions from people with lived experience who participate in the program. As we reimagine SNAP, its roots must be in restitution, repair, trust, and equity. Our recommendations are just the beginning of a long journey to making SNAP or another American food assistance program inherently anti-racist.



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