

Strengthening the Public Health Impacts of SNAP: Key Opportunities for the Next Farm Bill

Healthy Eating Research

July 2021



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Introduction

For decades, the federal nutrition safety net—administered by the United States Department of Agriculture (USDA)—has served as the nation's first line of defense for reducing food insecurity, where access to adequate food for an active, healthy life is limited by a lack of money or other resources (*See Key Terms*).^{1,2} The USDA Economic Research Service (ERS) reported food insecurity affected 10.5% of the U.S. population at some point in 2019, which was down from a peak of 14.9% in 2011; illustrating the length of time—about eight years—that it took to return to pre-recession (2007) levels.³ However, due to the COVID-19 pandemic and associated economic ramifications, food insecurity is now estimated to have jumped to the highest level in decades, affecting over 20% of Americans (approximately 1 in 4 households).^{4,5} Both before and during the pandemic, food insecurity has been disproportionately higher among low-income and rural populations, as well as communities of color.⁶

The largest USDA nutrition assistance program, often referred to as the cornerstone of the nation's nutrition safety net, is the Supplemental Nutrition Assistance Program (SNAP). As an entitlement program, SNAP is designed to expand as incomes fall, enabling the program to respond quickly when need increases. For example, prior to the pandemic, SNAP served an average of 37 million income-eligible Americans each month, with nearly half of them children;⁹ during the COVID-19 pandemic as many individuals have lost jobs or other sources of income, SNAP enrollment rapidly increased to more than 41.5 million.^{10,11} Congress reauthorizes SNAP approximately every five years as part of the Farm Bill (*See Call Box 1*).¹²

Over the last decade, the federal nutrition safety net has adapted to focus on improving diet quality and preventing obesity.¹³ This shift is important given that where food insecurity is high, often so is obesity.¹⁴ Obesity affects one quarter of all adults, about half of the Black and Latinx adult population, and one fifth of children, including about a quarter of Black and Latinx children.^{15,16} Native American adolescents are 30% more likely than non-Hispanic white adolescents to be obese and Native American adults are more than 50% more likely to be obese than non-Hispanic whites.¹⁷ Nearly half of adults are projected to have obesity by 2030 and a majority of children will have obesity by the time they are age 35.^{18,19}

Across the life course, food insecurity and obesity increase the risk for a constellation of indirect and direct consequences with short- and long-term impacts. Food insecurity has been associated with negative physical, cognitive, and emotional health outcomes²⁰, specifically poor diet quality,²¹ suboptimal development and function,²² increased hospitalizations and healthcare use,^{23,24} disrupted or under use of prescribed medications,^{25,26} poorer management of chronic diseases,^{20,27} elevated and prolonged

Key Terms

Co-benefits: The added benefits individuals receive when they act to promote a specific behavior, above and beyond direct, intended benefits

Diet quality: While metrics vary, diet quality generally refers to the foods and beverages needed to meet an individual's dietary needs.⁷ As one example, the Healthy Eating Index (HEI) is a measure of diet quality to assess how well a set of foods and beverages aligns with key recommendations of the latest edition of the *Dietary Guidelines for Americans*.

Electronic Benefit Transfer (EBT): An electronic system that allows SNAP participants, among others, to pay for food using federal nutrition assistance benefits at authorized retailers

Health equity: All populations having access to community conditions and opportunities needed to reach their full potential and to experience optimal health and well-being

Food insecurity: A lack of reliable access by all people at all times to enough food for an active, healthy life

Nutrition security: Consistent access, availability, and affordability of foods and beverages that promote well-being and prevent (and if needed, treat) disease⁸

Public health impacts: Improve food security, diet quality, health and/or well-being at the population level

Safety net: Social programs administered by the federal government with the goal of protecting income-eligible Americans from poverty

Thrifty Food Plan (TFP): One of the four USDA Food Plans that shows how a nutritious diet may be achieved with the least amount of resources and the one that serves as the basis for designing SNAP benefits

periods of stress,²⁸ reduced academic achievement,²⁹ decreased interpersonal skills,³⁰ fetal epigenetic changes,³¹ and infant mortality.³¹⁻³³ Obesity also increases the risk for a multitude of adverse diet-related health conditions (e.g., type 2 diabetes, cardiovascular disease, certain cancers),³⁴ has become the leading medical disqualifier for military service,^{35,36} and affects one fourth of all veterans.³⁷ In addition, obesity negatively affects social and emotional wellbeing and is associated with \$150 billion in direct medical costs annually.^{38,39} Diet-related chronic diseases are among the leading causes of death in the U.S.³⁴ and a major contributor to why total U.S. health care expenditures have risen

sharply since 1970, from 6.9% to 17.7% of Gross Domestic Product (GDP).^{40,41} Along these lines, one study estimated food insecure adults had annual health care expenditures that were \$1,834 higher than food secure adults.⁴²

Given the reach of the federal nutrition safety net, and its unprecedented use during the COVID-19 pandemic, efforts to strengthen the public health impact of this suite of 15 federal nutrition assistance programs provide critical opportunities to improve food security, diet quality, health, and well-being of millions of income-eligible Americans. This, in turn, could help close long-standing inequities in public health outcomes and—by doing so—promote cost savings in other federal safety net programs like Medicaid. Moreover, while the factors contributing to risk for COVID-19 are complex, there is mounting evidence indicating the long-standing disparities in nutrition and obesity—largely driven by structural racism⁴³—contribute to higher risk of infection and more serious illness, hospitalization, and deaths from the virus.⁴⁴⁻⁴⁶ Besides addressing food insecurity and obesity prevention, encouraging healthier eating patterns across the federal nutrition safety net (e.g., increased fruit and vegetable intake) could have strong synergy with environmental sustainability, which would ensure future generations have the natural resources available to live an equivalent, if not better, way of life as current generations.⁴⁷

This report will identify key opportunities in the next Farm Bill to strengthen the public health impacts of SNAP, while also more intentionally and effectively enhancing the program's co-benefits.

The opportunities put forth are evidence-based policy changes that have the greatest potential to improve SNAP participants' nutritional status and health. The report focuses on maximizing efforts over the next two years to help translate research into action and—where needed—address critical knowledge gaps. Already, Congress has acted swiftly in response to the COVID-19 pandemic to expand and extend the reach of SNAP. The continued pandemic response and associated economic recovery may necessitate the need for even bolder changes to SNAP, either in the next Farm Bill or even sooner through stimulus relief activities coming from Congress or executive actions.

Box 1. About the Farm Bill

The Farm Bill is a recurring omnibus bill reapproved about every five years by Congress.⁴⁸ The reauthorization of this large bill with diverse topics provides a regular opportunity to examine and reauthorize the operation and effectiveness of an array of agricultural, food and nutrition programs. Part of this reauthorization process often includes revising program funding and coverage, improving implementation, and considering, piloting, or scaling up opportunities to strengthen program impacts. The most recent Farm Bill, known as the Agricultural Improvement Act of 2018 ([P.L. 115-334](#)), has a total five-year cost (fiscal years 2019-2023) of \$428 billion⁴⁹ and includes twelve titles, or sections. The Nutrition title, which includes SNAP, is by far the largest component of the Farm Bill, accounting for 76% (\$326 billion) of the total 2018 Farm Bill budget. SNAP became a part of the Farm Bill about six decades ago as a pilot known as the Food Stamp Program.⁵⁰ This pilot was integrated into the Farm Bill to garner urban Congressional members' support for farming issues and was designed to reach less than 380,000 participants. The program has since grown into an entitlement program serving all income-eligible Americans, with a budget of \$114 billion in fiscal year 2021, which includes COVID-19 stimulus relief.⁵¹ The other nutrition programs included in the Farm Bill (detailed in Table 1) collectively account for over \$1 billion in budget over 5 years. The current Farm Bill expires on September 30, 2023.

SNAP Effectiveness: A Summary of the Evidence

Evidence suggests that SNAP is a proven policy approach for: (1) stabilizing the economy; (2) reducing food insecurity, health care expenditures and poverty; and (3) improving health outcomes (See **Figure 1**).

SNAP helps to stabilize the economy and lift Americans out of poverty

In 2018, SNAP lifted 3.2 million people, including 1.5 million children, out of poverty.^{52,53} SNAP's entitlement structure means that benefits are available to anyone who meets the program's eligibility rules. This enables SNAP to expand quickly and effectively when need increases, such as during an economic downturn, a pandemic, or after a natural disaster.⁵⁴ This increases SNAP spending, which allows the program to serve as an automatic economic stabilizer. Increased SNAP spending also has multiplier effects throughout the economy by generating income for those involved with food production, distribution, marketing, and sales. Research from the USDA Economic Research Service (ERS) shows that for every \$1 in new SNAP

benefits, up to \$2 of economic activity is generated.⁵⁵ ERS analyses also indicate a \$1 billion increase in SNAP benefits during an economic downturn:

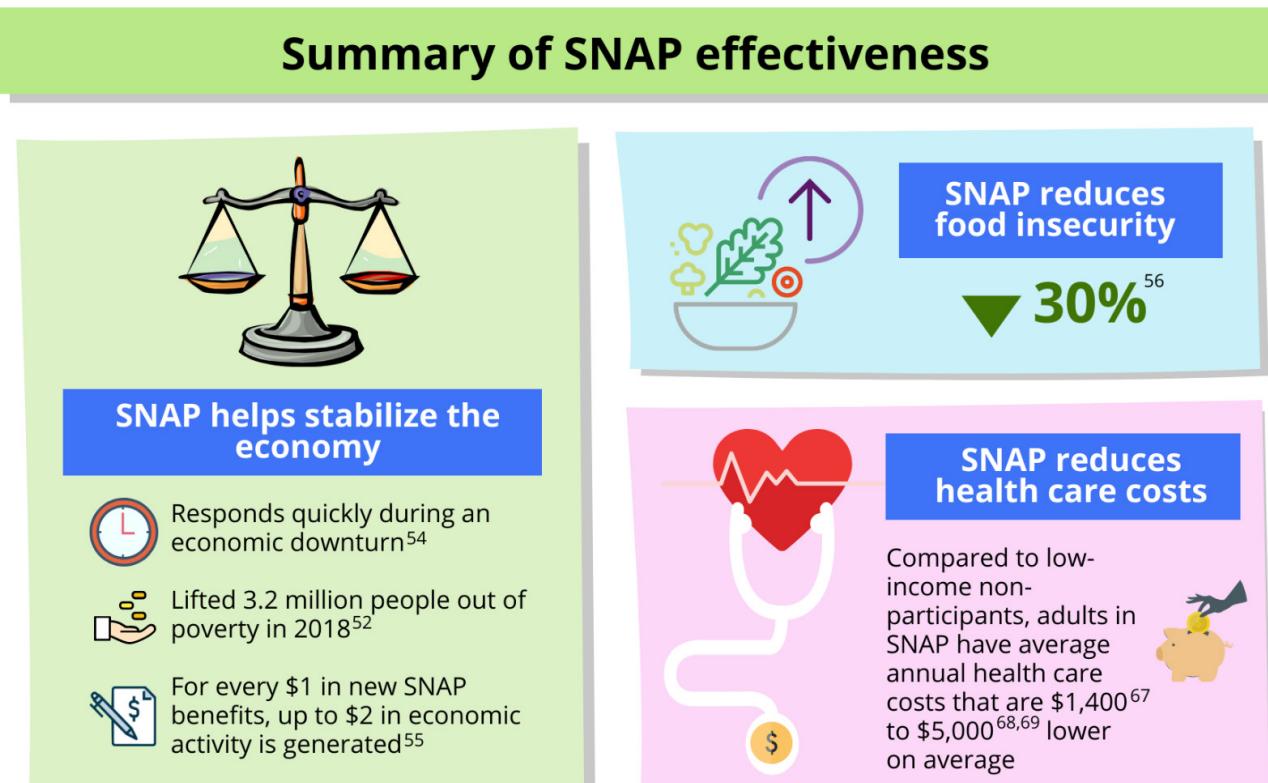
- Increases Gross Domestic Product (GDP) by \$1.54 billion,
- Supports 13,560 new jobs, and
- Creates \$32 million in farm income.

SNAP reduces food insecurity and improves health and wellbeing

Compelling evidence demonstrates the positive impact of SNAP on health and wellbeing by improving food security and health outcomes; specifically:

- SNAP reduces food insecurity by up to 30%;⁵⁶
- Adult SNAP participants are more likely to assess their health status positively, have fewer workplace absences due to illness, fewer physician visits, and are less likely to exhibit indicators of psychological distress;⁵⁷⁻⁵⁹

Figure 1. SNAP effectiveness: a summary of the evidence



- Adults who had access to SNAP during childhood exhibit lower adult obesity risk and other lower risk of chronic health conditions such as cardiovascular disease and type 2 diabetes;⁶⁰
- Children who participate in SNAP have better health status than their eligible non-participating peers and are less likely to reside in households that forego health care in lieu of other household necessities;^{61,62}
- The USDA administered Healthy Incentives Pilot (HIP), which tested a financial incentive for purchasing fruits and vegetables provided to SNAP participants at the point-of-sale in pilot sites in Hampden County, MA, increased the purchase of fruits, vegetables or other healthful foods and resulted in improved diet quality⁶³ and increased produce consumption (by about 1/3 cup⁶⁴ and via a broader variety of types of produce consumed⁶³); and
- The USDA administered Food Insecurity Nutrition Incentive Program (FINI), now known as the Gus Schumacher Nutrition Incentive Program (GusNIP), which is a competitive grant program for financial incentive projects that increase fruit and vegetable purchasing power of SNAP participants (nutrition

incentive) and produce prescription projects for income-eligible participants, found these incentive projects improve diet quality and produce consumption among SNAP participants participating in the program.⁶⁵

SNAP reduces health care costs

Evidence suggests that SNAP frees up household resources for the purchase of medications and reduces overall health care expenditures. Selected findings include:

- Older adults who participated in SNAP were 30% less likely to reduce or forego prescribed medication due to cost;⁶⁶ and
- Annual health care costs for adults in SNAP were nearly 25% (about \$1,400) less than those of non-participants⁶⁷ in one study while two other studies found that SNAP participation reduced health care costs by as much as \$5,000 per person per year.^{68,69}

Prior and Current Efforts to Strengthen the Public Health Impacts of SNAP

The three most recent Farm Bills—2008 ([P.L. 110-234](#)), 2014 ([P.L. 113-79](#)), and 2018 ([P.L. 115-334](#))—each included components designed to increase the public health impacts of SNAP (*See Figure 2*).¹³ The 2018 Farm Bill also included provisions that strengthen other programs in the federal nutrition safety net (*See Table 1*).

Congress has also utilized other legislative levers, besides the Farm Bill, to strengthen the public health impacts of the federal safety net (*See Table 2*).⁸⁸ For example, during the COVID-19 pandemic, the USDA used its Congressional authority from the 2018 Farm Bill to rapidly expand the SNAP Online Purchasing Pilot to address concerns about in-person shopping.⁸⁹

Figure 2. Examples of how the last three Farm Bills strengthened the public health impacts of SNAP

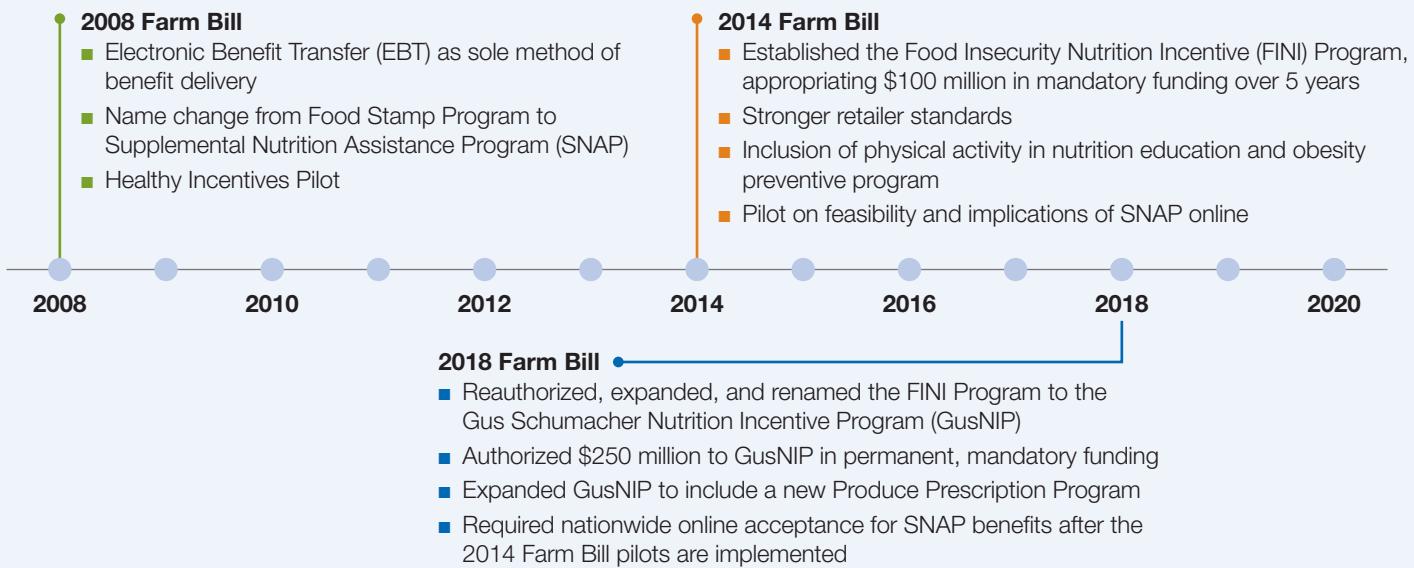


Table 1. Federal nutrition assistance programs and other relevant nutrition programs addressed in the 2018 Farm Bill (P.L. 115-334)^{1,12,49}

Program	Authorizing Statute(s)	Key 2018 Farm Bill Provisions	Estimated Annual Appropriations*	Participation
Federal Nutrition Assistance Programs				
Supplemental Nutrition Assistance Program (SNAP)	The Food and Nutrition Act of 2008 (P.L. 88-525, § 1 et seq.), among other authorizing statutes ¹	<ul style="list-style-type: none"> ■ Reauthorizes SNAP as an open-ended mandatory spending entitlement program funded through annual appropriations ■ Maintains current SNAP eligibility and benefit calculation rules, with a few amendments ■ Expands SNAP Employment & Training activities and increases program funding ■ Establishes a Nationwide Accuracy Clearinghouse to reduce errors and fraud in SNAP ■ Modifies SNAP's EBT system and benefit redemption ■ Reauthorizes the Food Insecurity Nutrition Incentive (FINI) program, now renamed the Gus Schumacher Nutrition Incentive Program (GusNIP), described further below 	\$114 billion in FY2021 ⁵¹ *95% of SNAP funds go towards the benefits themselves; remaining funds support matching states' administrative costs, employment & training, nutrition education, and other SNAP-related costs	Prior to the COVID-19 pandemic, SNAP served an average of 37 million individuals monthly. ¹⁰ During the COVID-19 pandemic, SNAP participation has risen to over 41.5 million individuals monthly, nearly half of whom are children; with a monthly high of about 43 million ^{10†}
Fresh Fruit and Vegetable Program (FFVP)	The Farm Security and Rural Investment Act of 2002 (P.L. 107-171) and The Agricultural Improvement Act of 2014 (P.L. 113-76); previously part of Child Nutrition Reauthorization	<ul style="list-style-type: none"> ■ Continues the \$50 million set-aside for USDA's fresh fruit and vegetable purchases for schools ■ Requires USDA to take certain actions to enforce school meals' Buy American requirements 	\$183 million in FY2021 ⁷⁰	Not available ⁷¹
Senior Farmers' Market Nutrition Program (SFMNP)	The Child Nutrition Act of 1966 as amended in 1992 (P.L. 102-314); The Farm Security and Rural Investment Act of 2002 (P.L. 107-171) permanently authorized the program and appropriated \$15 million until expended; The Healthy, Hunger-Free Kids Act of 2010 (P.L. 111-296, §424) authorized \$20 million per year; previously part of Child Nutrition Reauthorization	<ul style="list-style-type: none"> ■ Reauthorizes SFMNP and its mandatory funding 	\$21 million in FY2021 ⁵¹	832,111 individuals annually ⁷²
Food Distribution Program on Indian Reservations (FDPIR)	The Food and Nutrition Act of 2008 (P.L. 88-525 §4(b)), codified in The Agriculture Improvement Act of 2018 (P.L. 115-334); The Agriculture and Consumer Protection Act of 1973 (P.L. 93-86 §4(a))	<ul style="list-style-type: none"> ■ Reauthorizes FDPIR ■ Requires USDA to pay at least 80% of administrative and distribution costs, waives the tribal organization's share for those financially unable to contribute ■ Authorizes funding for a demonstration project for one or more tribal organizations to enter into self-determination contracts to purchase agricultural commodities under FDPIR 	\$162 million in FY2021 ⁷⁰	74,878 individuals monthly in 2020 and 83,811 individuals monthly in 2019, across 276 tribes ^{73,74}

Program	Authorizing Statute(s)	Key 2018 Farm Bill Provisions	Estimated Annual Appropriations*	Participation
The Emergency Food Assistance Program (TEFAP) Provides emergency food assistance at no cost through mandatory purchases of USDA Foods (a USDA FNS program that supports domestic nutrition programs and American agricultural producers through purchases of 100% American-grown and -produced foods for use by schools and institutions participation in the National School Lunch Program, the Child and Adult Care Food Program, and the Summer Food Service Program) and makes those foods available to State Distributing Agencies (e.g., food banks) and provides discretionary administrative storage and distribution grants	The Emergency Food Assistance Act of 1983 (P.L. 98-92), last amended through P.L. 115-334 , established the program and continues to govern its operations; The Hunger Prevention Act of 1988 (P.L. 100-435) authorized funds to be appropriated and formally named under the Food, Agriculture, Conservation, and Trade Act of 1990 (P.L. 101-624); The Agriculture Act of 2014 (P.L. 113-79) increased funding for the program and provided USDA Foods and federal support to emergency feeding organizations; The Food and Nutrition Act of 2008 (P.L. 88-525) provided mandatory funding authority for the program's entitlement commodities	<ul style="list-style-type: none"> ■ Reauthorizes mandatory TEFAP food purchases ■ Reauthorizes discretionary storage and distribution grants ■ Increases funding (estimated at \$206 million over 10 years) ■ Authorizes new projects to facilitate the donation of raw/unprocessed commodities by agricultural producers, processors, and distributors to emergency feeding organizations, known as the TEFAP Farm to Food Bank Program 	\$1 billion in FY2021 ⁷⁵	Not available ⁷⁶
Commodity Supplemental Food Program (CSFP) Works to improve the health of income-eligible seniors by distribution of commodities and providing administrative support to participating states and Indian Tribal Organizations	The Agriculture and Consumer Protection Act of 1973 (P.L. 93-86 §4(a)); The Agricultural Act of 2014 (P.L. 113-79) establishes CSFP to only serve eligible elders	<ul style="list-style-type: none"> ■ Reauthorizes CSFP through discretionary spending ■ Sets minimum and maximum lengths for CSFP household certification periods 	\$325 million in FY2021 ⁵¹	692,467 individuals monthly in 2020 and 702,565 individuals monthly in 2019 ⁷³
Other Relevant Nutrition Programs				
The Gus Schumacher Nutrition Incentive Program (GusNIP) formerly known as the Food Insecurity Nutrition Incentive Program (FINI) Supports competitive grants for financial incentive projects that increase fruit and vegetable purchasing power of SNAP participants (nutrition incentive) and produce prescription projects for income-eligible participants; funding is appropriated to the USDA Food and Nutrition Service (FNS) and the grant program is administrated and funded distributed to grantees by the USDA National Institute of Food and Agriculture (NIFA)	The Agriculture Act of 2014 (P.L. 113-79) authorized and appropriated \$100 million in mandatory funding over 2014 to 2018 to establish the Food Insecurity Nutrition Incentive (FINI) grant program	<ul style="list-style-type: none"> ■ Increases mandatory commitments to the program up to \$250 million over five years ■ Makes the program permanent ■ Renames the program the Gus Schumacher Nutrition Incentive Program (GusNIP) in honor of an integral champion of this program ■ Grants the Secretary of Agriculture the authority to establish produce prescription grants (10% of GusNIP appropriations legislative limit, \$7.5 million) ■ Requires the Secretary of Agriculture to issue guidance clarifying the process for retailer funded incentive programs to seek waivers to offer SNAP consumers incentives for purchasing healthy SNAP-eligible staple foods 	\$250 million over 5 years ⁷⁷ ; \$75 million in FY2021 ⁷⁸	Funding awarded to 30 grantees operating across 22 states in FY2020 and 23 grantees operating across 20 states in FY2019 ⁷⁹
Community Food Projects (CFP) Competitive Grants Program Supports competitive grants to create community-based food projects with objectives, activities and outcomes that are in alignment with the program's primary goals to improve community food security	The Federal Agriculture Improvement and Reform Act of 1996 (P.L. 104-127) authorized CFP, which amended the Food Stamp Act of 1977 (P.L. 95-113) and added § 25, Assistance for Community Food Projects	<ul style="list-style-type: none"> ■ Reduces funding for the CFP competitive grant program, providing \$5 million per year instead of \$9 million 	\$5 million in FY2021 ⁷⁰	Awarded projects in more than 400 communities in 48 states over the program's 23-year history ⁸⁰

Program	Authorizing Statute(s)	Key 2018 Farm Bill Provisions	Estimated Annual Appropriations*	Participation
Healthy Food Financing Initiative (HFFI) Supports the development or renovation of retail food outlets in underserved areas; administered by USDA Rural Development; ⁸¹ leveraged more than \$270 million in grants plus more than \$1 billion in additional financing over the last 10 years ⁸²	During fiscal years 2010 through 2016, the Departments of Agriculture, Health, and Human Services, and Treasury each administered HFFI projects independently and met periodically to share implementation strategies and issues; The Agricultural Act of 2014 (P.L. 113-179) granted the Secretary of Agriculture authority and appropriated \$125 million to establish America's HFFI, a public-private partnership administrated by the Reinvestment Fund on behalf of USDA Rural Development; Annual appropriations for fiscal years 2017 and 2018, \$1 million, in fiscal year 2019, \$2 million, and in fiscal year 2020, \$5 million ⁸³	<ul style="list-style-type: none"> ■ Reauthorizes HFFI ■ Makes slight amendments to HFFI including expanding eligible markets and food business incubators 	\$5 million in FY2021 ⁸¹	Supported 20 retail food projects across 20 states in 2020 ⁸² and nearly 1,000 projects in more than 35 states over the program's history ⁸⁴
The Farmers Market and Local Food Promotion Program (FMLFPP) The Farmers Market Promotion Program (FMPP)	FMPP was authorized in the 2002 Farm Bill (P.L. 107-171), and first launched in 2006 when it received appropriations; the 2008 Farm Bill (P.L. 110-234) was the first time mandatory funding was required; the 2014 Farm Bill (P.L. 113-79) expanded FMPP into FMLFPP and increased funding from \$10 million per year to \$30 million per year; the 2018 Farm Bill (P.L. 115-334) incorporated both programs into the new umbrella Local Agriculture Market Program (LAMP)	<ul style="list-style-type: none"> ■ Reauthorizes Farmers Market and Local Food Promotion Program (FMLFPP) as part of a new umbrella program known as the Local Agriculture Market Program (LAMP), administered by the USDA Agricultural Marketing Service (AMS) ■ Provides LAMP with \$50 million in mandatory funding per year, of which \$23.5 million is reserved for FMLFPP ■ Requires a 25% match of total cost of the grant 	\$76.9 million in FY2021, divided equally between FMPP and LFPP ⁸⁵	49 grants were awarded in FY 2020 for FMPP ⁸⁶ 44 grants were awarded in FY 2020 for LFPP ⁸⁷
The Local Food Promotion Program (LFPP) Supports competitive grants for local and regional food business enterprises acting as intermediaries between producers and consumers, administered by the USDA Agricultural Marketing Service (AMS)				

*Figures include COVID-19 stimulus relief

† Some states were incorrectly combining Pandemic EBT and SNAP participation in their monthly reporting in the early stages of the COVID-19 pandemic, so data may include disaster assistance

In addition, on January 22, 2021, to address the growing national hunger crisis, President Biden issued an Executive Order asking the USDA to consider expanding and extending federal nutrition assistance programs.⁹⁰ As a result, the following changes were made:

- On January 22, 2021, USDA announced an increase to the Pandemic Electronic Benefits Transfer (P-EBT) benefit by approximately 15%, with the new, higher benefit retroactive back to the beginning of school year 2020-2021. P-EBT provides nutrition food to millions of children missing meals due to school and childcare closures. This increase is in effect for the duration of the public health emergency.⁹¹
- On April 1, 2021, USDA announced it is providing \$1 billion per month in additional food assistance during the COVID-19 national emergency to an estimated 25 million people beginning April 2021.^{92,93} This change allows states to provide larger emergency SNAP allotments for the lowest-income households and addressed the lawsuits challenging the Trump administration's resistance to this approach; and
- On February 19, 2021, USDA announced an economist position to assist with supporting the development of the USDA Food Plans.⁹⁴ This new position will be tasked with revising the Thrifty Food Plan to better reflect the cost of a modern healthy diet, and then updating food assistance benefits to reflect these true costs. USDA also hosted a listening session on updating the Thrifty Food Plan in April 2021.

President Biden also issued another Executive Order on January 20, 2021 to advance racial equity and support for underserved communities. Each federal agency, including the federal nutrition safety net, is called up to assess whether, and to what extent, its programs and policies perpetuate systemic barriers to opportunities and benefits for people of color and other underserved groups.⁹⁵

On April 28, 2021, President Biden announced the American Families Plan,⁹⁶ which includes a number of nutrition related provisions including: expanding summer EBT to all eligible children nationwide; expanding school meal programs by leveraging the Community Eligibility Provision (CEP) which allows high-poverty schools to provide meals free of charge to all of their students; launching a healthy foods incentive demonstration to improve the nutrition standards of school meals; and facilitating re-entry for formerly incarcerated individuals through SNAP eligibility. This plan has not been enacted as law yet and will need the support of Congress.

Table 2 provides additional examples of legislation in the past decade that has strengthened the public health impacts of the federal safety net, including, but not limited to SNAP.

Table 2. Selected non-Farm Bill legislation that strengthened the public health impacts of the federal safety net, with an emphasis on SNAP relevant provisions⁷⁸

The American Recovery and Reinvestment Act of 2009 (P.L. 111-5)

- Authorizes a 13.6% increase to the Thrifty Food Plan for most households until 2013

The Healthy, Hunger-Free Kids Act of 2010 (P.L. 111-296)

- Strengthens the nutrition standards for school and childcare based federal nutrition assistance programs
- Expands SNAP-Ed to a Nutrition Education and Obesity Prevention Grant program⁹⁷

Initial COVID-19 Stimulus Bills (P.L. 116-123; P.L. 116-127; P.L. 116-136)

- Temporarily suspends the time limits for Able-Bodied Adults Without Dependents (ABAWD) SNAP participants during the COVID-19 pandemic
- Allows Emergency allotments for all SNAP households up to the maximum benefit (\$646 for a family of four) during the duration of the pandemic
- Authorizes the Pandemic Electronic Benefits Transfer (P-EBT) for households with children who would normally receive free or reduced-price school meals if school is closed for at least five consecutive days during the pandemic
- Allows Re-Enrollment Flexibilities to extend deadlines for participants re-enrolling to receive SNAP benefits
- Permits adjustments to Interview Requirements to allow flexibilities around in-person interview approval process, among other administrative flexibilities including for Disaster SNAP (D-SNAP)
- Allows a variety of new authorities and flexibilities for school and childcare based nutrition assistance programs, as one example, allows states to permit universal free school meals; authorizes USDA to waive the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) regulatory requirements at a state's request, including the physical presence requirement; appropriates additional funds to The Emergency Food Assistance Program (TEFAP); appropriates additional funds for Senior Nutrition program operated by the U.S. Department of Health and Human Services; among others

The Fiscal Year 2021 Continuing Resolution (P.L. 116-159)

- Extends the majority of states' federal nutrition assistance program administrative flexibilities and program waivers

The Fiscal Year 2021 Consolidated Appropriations Act (P.L. 116-260)

- Increases the monthly SNAP benefit level by 15% based on the June 2020 Thrifty Food Plan through June 30, 2021
- Simplifies the state administration costs through fiscal year 2021 and requires these funds to be made available to states within 60 days of enactment
- Excludes Pandemic Unemployment Compensation from being counted toward household income for SNAP
- Extends SNAP eligibility to college students who are eligible for a federal or state work study program or has an expected family contribution of zero
- Requires the Secretary of Agriculture submit a report on the SNAP redemption rate and account balances for each month from January 2021 to June 2021
- Shortens the statutory waivers for certain SNAP quality control requirements from September 30, 2021 to June 30, 2021
- Provides \$5 million for technical support to USDA in expanding online purchasing program, including for farmers' markets and direct marketing farmers, and for supporting mobile payment technologies and the EBT system⁹⁸
- Provides \$614 million to Puerto Rico and American Samoa for the Nutrition Assistance Program (NAP), of which \$14 million shall be available to the Commonwealth of the Northern Mariana Islands
- Provides \$75 million in emergency funding for GusNIP fruit and vegetable incentive projects, along with additional flexibilities including adjustments to the non-federal funding matching requirement
- Authorizes 2% of SNAP-Ed funding through September 30, 2022 be used to establish a stronger federal coordination entity for the program

American Rescue Plan of 2021 (P.L. 117-2)

- Extends P-EBT for the duration of the COVID-19 national public health emergency, including through summer 2021, to allow families with children receiving school meals to purchase healthy foods and beverages more easily during the pandemic
- Extends the 15% SNAP increase benefits for all participants through September 30, 2021, or about \$27 per month per person in additional funds, with \$1.15 billion allocated for the cost of state administrative expenses
- Invests in technological improvements to expand access for families to use their SNAP benefits to purchase groceries online
- Appropriates \$1 billion in nutrition assistance for the U.S. territories participating in the NAP
- Appropriates \$880 million to deliver expanded access to fruits and vegetables for women and infants through WIC and investments in WIC innovations
- Appropriates \$37 million for senior nutrition through the Commodity Supplemental Food Program (CSFP)
- Increases food available for distribution through food banks, nonprofits, or restaurants to help feed families in need and at the same time supports farmers by purchasing their product
- Strengthens and expands the Child Tax Credit
- Provides states with \$1.135 billion to support and enhance their SNAP administration

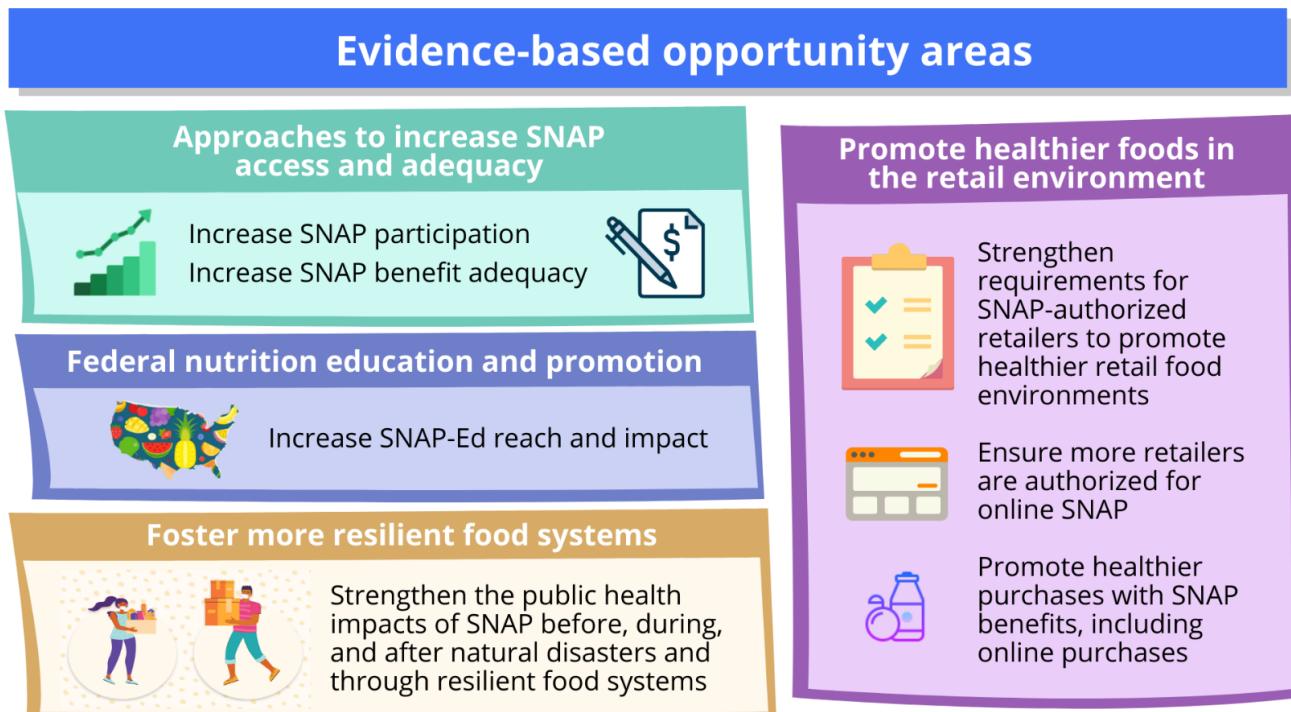
Key Opportunities in the Next Farm Bill to Strengthen the Public Health Impacts of SNAP

Figure 3 identifies four key areas in the next Farm Bill to further strengthen SNAP's public health impacts, while also more intentionally and effectively enhancing the program's co-benefits—(1) increasing SNAP access and adequacy; (2) strengthening federal nutrition education and promotion; (3) fostering more resilient food systems; and (4) promoting healthier foods and beverages in the retail environment. The opportunities put forth focus primarily on federal-level interventions, and are meant to create a high-level platform onto which other stakeholders can add more detail; for instance, diving deeper into the critical roles of state, tribal, territorial, and local innovations. Moreover, these opportunities vary in terms of their potential impacts, and those that improve access to participation, access to healthy foods and beverages at local stores, and adequate benefits to purchase these healthier items, are likely to have the greatest potential to address racial inequalities.

Racial equity and tribal government equity are intentionally not identified as stand-alone opportunities as they should be woven throughout all efforts aimed at strengthening the public health impacts of SNAP, among other federal nutrition

assistance programs. Fully incorporating a racial equity and tribal government equity lens into these efforts will require direct engagement with SNAP participants and those who are eligible for the program, but not enrolled to fully understand the end user experience and key barriers to access. Also critical to strengthening the public health impacts of SNAP is a focused effort on socially disadvantaged populations, such as mixed immigration status households, young adults who are not attending college, and other adults who are subject to the three month SNAP time limit (as explained later, able bodied adults without dependents can receive SNAP benefits for only three months in a three-year period, unless they are meeting a work requirement). Without a deliberate focus on racial equity, tribal government equity, and socially disadvantaged populations, the full potential of SNAP to promote the public's health cannot be realized. Importantly, SNAP is not always easily accessible, particularly for rural, remote communities, including but not limited to Indian reservations, where structural issues perpetuate a lack of access to affordable healthy foods and beverages, including safe drinking water.

Figure 3. Key opportunities to strengthen the public health impacts of SNAP in the next Farm Bill



*Racial equity and tribal government equity should be woven throughout all of these opportunities

For each of the opportunities included in Figure 3, the following section provides an (1) overview of the current policy landscape; (2) a summary of evidence supporting this as an important focal point for change; and (3) key suggestions for accelerating positive movement going forward. Over the next few years before reauthorizing the Farm Bill, Congress has a critical window to engage in a range of cross-cutting activities to assess the current status of SNAP and to examine opportunities to improve program effectiveness. **Table 3** lists possible mechanisms and selected examples of Congressional activities that could occur in preparation for reauthorizing the next Farm Bill.

Authorizing and appropriating research and evaluation funds can help to address critical unanswered questions that will aid in increasing SNAP's public health impacts. But other stakeholders can help build the evidence base as well. **Table 4** outlines four important areas for future inquiry, which could be supported by philanthropic or federal research funding.

Any research and evaluation needs to be conducted with an eye towards equity, and safety net programs should be examined holistically rather than in silos. Finally, it is critical for this work to document key impacts and possible unintended consequences from the range of program waivers and flexibilities put in place during the COVID-19 pandemic so that this knowledge can be applied during the next pandemic or future natural disaster(s).

Opportunity: Increase SNAP Participation

Current policy landscape

A variety of federal, tribal, territorial, state and local eligibility and enrollment policies as well as outreach practices impact SNAP participation and churn, which is defined as when a household exits SNAP and then re-enters the program a few months later. **Table 5** summarizes key policies affecting SNAP participation.

Table 3. Selected Congressional activities in preparation for reauthorizing the next Farm Bill

Possible Mechanism	Selected Example
Inquiries and Reporting	Congress could send inquiries to relevant federal departments and agencies, most notably USDA, regarding existing and potential ways to strengthen the public health impacts of SNAP during disasters
Meeting with the Biden Administration	Congress could meet with the Biden administration and/or certain appointees during Senate confirmation to understand the administration's activities underway and if and how Congressional authority and appropriations would be needed to make the recommended updates to the USDA food plans
Hosting Congressional Hearings	Congress could host Congressional hearings regarding SNAP benefit adequacy and explore how the recent COVID-19 increases have been implemented and the impact of these increases on participants
Requesting Government Accountability Office (GAO) Assistance	Congress could ask the GAO ⁹⁹ to examine the impacts of these various SNAP eligibility and outreach policies and practices at the federal, state, tribal, and territorial levels, overall and by demographic groups
Appropriating Funding	Congress could use potential additional COVID-19 stimulus packages, annual appropriations, Immigration Reform, among other legislative levers to address SNAP eligibility requirements to ensure those in need of federal nutrition assistance are able to access it as needed, and equally across states, tribes, and U.S. territories
Making Laws and Providing Key Authorizations	Congress could make permanent changes during annual appropriations, the next Farm Bill, or other legislative levers to SNAP benefit adequacy and issuance

Table 4. Strengthening SNAP's public health impacts: important areas for future inquiry

Area of Future Inquiry	Selected Example
Public Health Impacts and Outcomes	Improved health and/or well-being; reductions in diet-related disease burden, low infant birthweight, and associated mortality
Barriers to Adoption for Participants and Retailers	Purchasing and stocking healthier foods and beverages
Refinement of Place-based Programs to Align with Community Context and Needs	Streamlined participation across the federal social safety net
Co-benefits of Multiple Program Participation	Individual health and program cost impacts of participating in multiple safety net programs

Evidence that a change might improve public health

As illustrated in **Figure 1**, increasing SNAP participation reduces food insecurity, reduces healthcare costs, and helps stabilize the economy. Administrative ‘churning’ in SNAP increases household food insecurity and financial stress and is associated with increased administrative costs with evidence suggesting that Black and Latinx households are more likely to experience churning than white households.¹³⁷ The state SNAP eligibility, enrollment, and outreach variations may partly explain the considerable differences in SNAP participation across states and by demographic characteristics (race/ethnicity, age).^{1,13,138}

Key steps to increase SNAP participation

■ **Advance equity** – President Biden’s Executive Order to advance racial equity and support for underserved communities requires each federal agency, including the federal nutrition safety net, to assess whether, and to what extent, its programs and policies perpetuate systemic barriers to opportunities and benefits for people of color and other underserved groups.⁹⁵ The recently confirmed Secretary of Agriculture for the Biden administration, Tom Vilsack, has indicated he will work to address inequity and inequality.^{139,140} FNS also recently introduced four priorities areas for state SNAP outreach plans: racial equity, students, immigrant communities and mixed status families, and veterans.¹⁴¹ Congress could host hearings to explore emerging best practices in promoting diversity, equity, and inclusion among our social safety net and key strategies needed to accelerate this work. The Government Accountability Office (GAO) could also be tasked to explore how to apply an equity lens¹⁴² to existing and future policies with direct and indirect effects on SNAP participation, among other social service programs. Specific to three US territories, Congress could amend the Food and Nutrition Act of 2008 (*P.L. 88-525*) to transition Puerto Rico, American Samoa, and the Commonwealth of the Northern Mariana Islands from NAP to SNAP.¹¹⁸ For Native Americans, Congress could allow FDPIR and SNAP

participation in the same month and assess the benefit adequacy of FDPIR to determine if changes are needed to better align SNAP and FDPIR benefits. The assessment should include any temporary or permanent increases in SNAP benefit adequacy. In addition, Congress could grant the USDA Food and Nutrition Service the requisite 638 authority to provide tribes with the authority to administer SNAP, among other federal nutrition assistance programs.

■ **Strengthen national monitoring and surveillance systems**

– A fundamental component of advancing equity will be investing in national monitoring and surveillance systems that include socially disadvantaged populations.¹⁴³ Most U.S. food security and nutrition relevant monitoring and surveillance systems do not include Native Americans, among other socially disadvantaged populations, or when these groups are included, they are often categorized as “other” given their relatively small sample size.^{3,9,144-146} More work remains to ensure our monitoring and surveillance systems are adequately supported to ensure Native Americans, and other socially disadvantaged groups, are visible in national data. To gather this type of data going forward, the federal government should work in collaboration *with* tribal governments, among other socially disadvantaged populations, to ensure federal data is gathered, analyzed, disseminated, and accessible in ways that ensure data integrity while also honor Indigenous data sovereignty.¹⁴⁷ One potential model is the Census of Agriculture led by the USDA National Agricultural Statistics Service.¹⁴⁸

■ **Stronger whole-of-government approach** – Better synergies at the federal, tribal, territorial, state, and ultimately local levels to help an individual or family navigate the portfolio of federal nutrition assistance programs, as well as other social services such as Medicaid, are critical. As one example, Share Our Strength’s No Kid Hungry campaign is investing nearly two million dollars in six states to advance SNAP agency innovation and interagency coordination to reduce childhood hunger, with support from the American Public Human Services

Table 5. Key policies affecting SNAP participation

Policy	Description and Impact on SNAP Participation
The Trump Administration's Final Rule Altering the Public Charge Rule (Now Rescinded)	<p>Public charge is not defined by statute; however, the public charge inadmissibility test has been enshrined in our nation's immigration laws since the Immigration Act of 1882 (P.L. 47-376). Generally, the public charge inadmissibility test refers to the ability of the U.S. government to deny a U.S. visa to anyone who is likely to be dependent on government benefits. In 1999, the Clinton administration announced a clarification about new U.S. Citizenship and Immigration Services (USCIS) policy, which was consistent with the USDA Food and Nutrition Service (FNS) WIC Policy Memorandum #98-7, dated March 19, 1998 that was developed based on agreements reached with the USCIS and the U.S. State Department. Specifically, the Interim Field Guidance on Deportability and Inadmissibility on Public Charge Grounds (64 FR 28689) indicated getting nutrition assistance through USDA FNS does not make an immigrant a public charge. That is, an immigrant to the U.S. will not be deported, denied entry to the country, or denied permanent status because he or she receives food stamps (now known as SNAP), WIC, free and reduced price school lunches or other nutrition assistance from USDA FNS. In 2011, the Obama administration put forth similar guidance on non-citizen eligibility for SNAP.¹⁰⁰ The Trump administration attempted to change this policy by proposing a final public charge rule that would hinder a path to citizenship if immigrants (lawfully present or not) participated in certain federal safety net programs, including SNAP.¹⁰¹ The Biden administration rescinded the Trump administration's updated public charge rule in March 2021, following a Supreme Court ruling dismissing a series of pending appeals over the controversial updates the Trump administration made to the public charge rule.¹⁰¹ Currently, USCIS is following the longstanding public charge interim field guidance issued in 1999. President Biden has also adopted a series of immigration executive orders and announced his plan to send an immigrant bill to Congress calling for a pathway to citizenship, which provides opportunities for more clarity on the role of federal nutrition safety net participation on immigration status.¹⁰²⁻¹⁰⁴ The Trump administration's public charge rule, among other immigration policies, was estimated to result in tens of thousands fewer children receiving SNAP and had a chilling effect on participation in a range of other federal safety net programs.¹⁰⁵ One analysis estimated about 1.8 million fewer individuals, many of whom are citizens, would receive SNAP benefits under the Trump administration's public charge rule.¹⁰⁶</p>
The Trump Administration's Final Rule Requiring Stricter SNAP Work Requirements (Now Rescinded)	<p>Adults who are ages 18-49, able to work, and do not have dependents (often referred to as Able-Bodied Adults Without Dependents (ABAWDs)) are not able to receive SNAP benefits for more than three months within a three year period unless they are working, enrolled in a work program, or participating in some combination of those two for 80 hours each month.¹⁰⁷ States can request waivers of the time limit to certain restricted conditions such as higher unemployment. The Trump administration attempted to impose stricter SNAP work requirements for ABAWDs (84 FR 66782), but significant provisions were temporarily suspended by Congress during the COVID-19 pandemic and other provisions were halted by the courts due to violations in the Administrative Procedures Act. USDA aims to publish a notice in the Federal Register to confirm its return to long-standing SNAP work requirement regulations and allowance of state waivers that existed prior to the publishing of the Trump administration's final rule. Multiple analyses estimated more than one million adults would no longer be eligible for SNAP under the Trump administration's stricter work requirements.¹⁰⁸⁻¹¹⁰ Even the USDA estimated about 700,000 people would have lost access to SNAP benefits if the final rule was promulgated as planned. Besides work requirements, SNAP provides employment and training support services. Specifically, the USDA SNAP Employment and Training program (SNAP E&T) is federally funded and administered at the state level and provides SNAP participants access to training and support services that help SNAP participants enter or move into the workforce, such as transportation and childcare. On January 5, 2021, USDA put forth a final rule, which implements 2018 Farm Bill requested changes to SNAP E&T; as one example, requirements for state agencies to consult with their state workforce development boards on the design of their SNAP E&T program (88 FR 358).</p>
The Trump Administration's Proposed Rule Altering Broad-Based Categorical Eligibility (BBCE) (Now Withdrawn)	<p>Broad-based categorical eligibility (BBCE) allows states to raise SNAP income eligibility limits to enable more working families to participate in SNAP. States can also adopt less restrictive asset tests so that families, seniors, and people with a disability can have modest savings while participating in SNAP.¹¹¹ A proposed rule by the Trump administration aimed to significantly alter BBCE but was withdrawn in the final days of the administration.¹¹² Evidence suggests this policy approach eliminates a "benefit cliff" whereby a family can lose substantial SNAP benefits from a small earnings increase that raises their gross income over SNAP's eligibility threshold.¹¹³ The Trump administration's proposed revision of BBCE would have resulted in an estimated 9% of participating SNAP households (containing 3.1 million individuals) in fiscal year 2020 no longer able to meet SNAP's income and asset eligibility requirements (84 FR 35570).</p>
The Trump Administration's Proposed Rule Altering Standard Utility Allowances (Now Withdrawn)	<p>A proposed rule by the Trump administration, which was withdrawn in the final days of the administration, aimed to create a uniform approach to setting standard utility allowances (SUAs) and convert the telephone allowance to a telecommunications allowance that includes basic internet service.¹¹⁴ An estimated 19% of SNAP households would have received lower SNAP monthly benefits if this proposed rule was implemented; establishing a national standard for utility deductions involving calculating the cost of utilities might have translated into more than 8,000 families no longer receiving SNAP benefits.¹¹⁵</p>
Nutrition Assistance Program (NAP) Block Grant for Three U.S. Territories Instead of SNAP	<p>A block grant (Nutrition Assistance Program, NAP) rather than an entitlement program (SNAP) operates in Puerto Rico, American Samoa, and the Commonwealth of the Northern Mariana Islands, which means there is only a fixed total amount of annual funding available for food assistance for those regions from the federal government, regardless of need.¹¹⁶⁻¹¹⁸ The 116th Congress introduced bills (S.677, H.R.1576, H.R.6846) that proposed to amend the Food and Nutrition Act of 2008 (P.L. 88-525) to provide for participation of these three U.S. territories in SNAP instead of the NAP. There are also legal battles underway regarding the constitutionality of providing lower social assistance benefits to Americans living in U.S. territories (<i>Peña Martínez v. Dep't of Health & Hum. Servs.</i>, 478 F.Supp.3d 155 (D.P.R. 2020), decision currently on appeal to the First Circuit; <i>United States v. Vaello-Madero</i>, 956 F.3d 12 (1st Cir. 2020), <i>a petition for certiorari</i> has been filed <i>and has recently been distributed for Conference with petitions granted for extensions to file the briefs on the merits filed</i>).¹¹⁹ While an updated feasibility study is underway, a 2010 USDA feasibility study estimated an increase of 85,000 households with 220,000 persons would participate in SNAP if a transition from NAP to SNAP occurred in Puerto Rico; an increase of 15.3%.¹¹⁶</p>

Policy	Description and Impact on SNAP Participation
FDPIR and SNAP Co-Participation Restrictions and Importance of Tribal Administration of SNAP	<p>As described in Table 1, FDPIR was established to help alleviate the challenges residents on federal Indian reservations encounter in redeeming SNAP benefits at SNAP-authorized stores or in enrolling in the program due to the SNAP offices being located so far from their homes. Each month FDPIR provides USDA Foods to about 83,811 individuals across 276 tribes.^{73,74} FDPIR eligibility requirements are similar to SNAP, but the value of the food benefits distributed to FDPIR participants are significantly less than SNAP benefits.¹²⁰ FDPIR participants cannot also participate in SNAP in a given month.¹²¹ According to the Indigenous Food and Agriculture Initiative, the Farm Bill provides an opportunity for Congress to build upon the results and tribal suggestions stemming from USDA's feasibility study on tribal administration of federal nutrition assistance programs. USDA should work to provide tribes the authority to administer federal nutrition assistance programs by expanding 638 authority, which would allow tribes to engage more efficiently with the USDA Food and Nutrition Service and assure tribal administration and control of the delivery of a vast array of USDA programs, including SNAP.¹²²⁻¹²⁴ The 2018 Farm Bill authorized the Tribal Self-Determination Project for FDPIR Food Procurement and Congress appropriated three million to the 638 demonstration project. A 2016 Urban Institute report found improvements in FDPIR products provided, and principles of tribal self-determination and self-governance, among other factors. Findings justify FDPIR as a desirable alternative to SNAP for those living on or near the reservation, while the need for improvements in benefit equivalence between the program remains.¹²⁵</p>
College SNAP Rule and Other SNAP Participation Challenges for Young Adults	<p>The College SNAP rule means college students, except for certain non-traditional and income-eligible students, are ineligible for SNAP participation.^{126,127} USDA recently put out guidance regarding a Congressionally mandated COVID-19 extension of SNAP eligibility to college students who are now eligible for a federal or state work study program or have an expected family contribution of zero.¹²⁸ A 2018 GAO report estimated 3.3 million students were potentially eligible for SNAP but less than half participated.¹²⁹ Another issue is how SNAP work requirements and certain household provisions make it prohibitive for adolescents and young adults not enrolled in college to participate in SNAP, though they may be experiencing high levels of food insecurity.^{130,131} On April 9, 2021, USDA announced that young adults under the age of 25 experiencing homelessness will now be able to receive meals at emergency shelters participating in the USDA Child and Adult Care Food Program (CACFP).¹³² Scant attention has been given to addressing food insecurity and SNAP participation hurdles among emerging adults not enrolled in college.¹³⁰</p>
State Punitive Child Support Mandates	<p>SNAP encourages income-eligible, non-custodial parents to establish a child support order and make child support payments. A few states have adopted a punitive mandate.¹³³ Some policymakers have explored taking away SNAP benefits from parents who do not cooperate with the Child Support program.¹³⁴ More than a third (37%) of children with a parent living outside of their home live in poverty and about one-fifth of all SNAP households with children receive child support payments.¹³⁴ A 2020 analysis by the Center on Budget and Policy Priorities determined child support cooperation requirements in SNAP are costly and burdensome to vulnerable families.¹³⁴</p>
State Drug Felon Bans	<p>The 1996 Personal Responsibility and Work Opportunity Reconciliation Act (PL. 104-193, codified as 21 U.S. Code §862a) bans drug felons from receiving SNAP benefits, but allows states to opt in or modify the ban without any reduction in SNAP funding, resulting in a diverse array of SNAP eligibility standards related to felony convictions.¹³⁵ Currently, drug offenders constitute the largest portion of inmates entering federal prison. Evidence suggests withholding SNAP benefits from drug offenders has a negative effect on reintegration and recidivism. Regarding other crimes, Section 4008 of the 2014 Farm Bill prohibits anyone convicted of federal aggravated sexual abuse, murder, sexual exploitation and abuse of children, sexual assault, or similar state laws, and who are also not in compliance with the terms of their sentence or parole, or are a fleeing felon, from receiving SNAP benefits.¹³⁶ The Biden Administration's proposed American Families Plan includes a provision for facilitating re-entry for formerly incarcerated individuals convicted of a drug-related felony through SNAP eligibility.⁹⁶ This provision will need the support of Congress.</p>

Association.¹⁴⁹ Aside from stronger coordination within the federal nutrition safety net, stronger inter-departmental partnerships could be made to streamline enrollment across the social safety net and develop innovative approaches to lift participants out of poverty. For example, key partnerships could be made between the U.S. Department of Labor and USDA SNAP Employment and Training program to provide more innovative and coordinated approaches to assist SNAP participants in their return to the workforce during the COVID-19 pandemic and associated economic depression. Other key USDA partnerships include the U.S. Department of Defense and the Veterans Health Administration, given food insecurity prevalence among our active-duty military families, as well as our veterans.³⁶

■ **Better leverage data and pilots using a human centered design approach** – USDA grants to state agencies and their community-based and faith-based partners help, but stronger investments in administrative data, pilot programs, and initiatives that aim to simplify and expand federal nutrition assistance program participation using an equity lens are needed.¹⁵⁰⁻¹⁵² This work necessitates gathering input through public dialogue with SNAP participants and those eligible but not participating, particularly among socially disadvantaged populations such as mixed immigrant households, and with an eye towards cultural inclusiveness.^{153,154} A recent USDA funded report evaluating online applications for SNAP enrollment and recertification across eight states highlights how online applications can improve accessibility and increase

participation.¹⁵⁵ Pilots should consider how to identify and scale up common enrollment platforms or integrated benefits applications across multiple safety net programs to promote participation and reduce participant burden. These efforts should identify best practices to be more culturally and linguistically responsive. Pilots could also examine how to best integrate lay professionals such as Extension agents and community health workers. Congress could host hearings to learn more from the efforts of the U.S. Digital Service and General Services Administration, among others, which have been working on modernizing the way government approaches technology, including intersections with the social safety net.¹⁵⁶⁻¹⁵⁹

Opportunity: Increase SNAP Benefit Adequacy

Current policy landscape

The USDA Center for Nutrition Policy and Promotion (CNPP) puts forth food plans intended to represent a nutritious diet at four different cost levels (*See Table 6*), with the assistance of the USDA Food and Nutrition Service (FNS), Economic Research Service (ERS), and Agricultural Research Service (ARS).¹⁶⁰

The Thrifty Food Plan (TFP) is the basis for determining the monetary value of SNAP benefits. The Low-Cost Food Plan is used by bankruptcy courts to determine alimony and child support payments for 1.5 million people. The Moderate (65% higher cost than TFP) and Liberal (doubles the cost of TFP) Food Plans are used by the Department of Defense to set Basic Allowances for Subsistence (i.e., food allowance) for 1.4 million service members.

The four USDA food plans have not been updated in quite some time, even though the dietary reference intakes (DRIIs) and dietary guidelines (DGAs) on which they are based have been updated in recent years. The nutritional bases of the four food plans are:¹⁶⁰

- 1997-2005 DRIIs¹⁶¹ (the U.S. and Canadian governments have jointly released more recent DRI reports including a 2019 report on the DRIs for sodium and potassium);
- 2005 *Dietary Guidelines for Americans*¹⁶² (the USDA released the 2020-2025 edition in December 2020¹⁶³); and
- 2005 MyPyramid food intake recommendations¹⁶⁴ (the USDA replaced MyPyramid with MyPlate/MiPlato in June 2011¹⁶⁵).

Besides cost, the USDA food plans differ in specific foods and quantities of food, which have not been updated since 2006 (Thrifty Food Plan) and 2007 (Low-Cost, Moderate-Cost, and Liberal Food Plans).^{160,166,167} All food plans are based on the premise that: (1) all meals and snacks are prepared at home from scratch (estimated at 13-16 hours per week),¹⁶⁸ (2) food prices do not vary around the country, and (3) all Americans have access to the resources necessary to prepare nutritious foods and beverages.¹⁶⁹

Cost estimates for the four USDA food plans are based on the 2001-2002 National Health and Nutrition Examination Survey (NHANES) and the 2001-2002 Food Price Databases and are updated to current dollars by using the Consumer Price Index for specific food items.¹⁶⁷ The Food and Nutrition Act of 2008 (*P.L. 88-525*) requires the average cost of foods in the marketplace be used to adjust the maximum SNAP benefit allotments from year-to-year, though the Secretary of Agriculture has some discretion in increasing the value of the TFP (*7 U.S. Code § 2012(u)*) and (*7 U.S. Code § 2017(a)*). Usually, the USDA uses the food costs reported in June of a given fiscal year to calculate the SNAP maximum allotments for the next fiscal year (October through September). Since the 1970s, these TFP annual updates have been fixed in inflation-adjusted terms.¹⁷⁰ This is problematic because the price of both food-at-home and fruits and vegetables have risen faster than overall prices over the course of the COVID-19 pandemic, with some exceptions.¹⁷¹

Table 6. Monthly costs for the four USDA Food Plans (for a family of four)

Thrifty Food Plan	Low-Cost Food Plan	Moderate-Cost Food Plan	Liberal Food Plan
\$682.80	\$901.50	\$1,120.90	\$1,361.50

Source: USDA Official USDA Food Plans of Food at Home at Four Levels, U.S. Average, April 2021¹⁶⁰

In July 2020, the USDA released its June 2020 Cost of Food Report and announced a 5% increase in the cost of the TFP from the previous year, which would begin in October 2020.¹⁷² As of January 2021, Congress (*PL. 116-260*) increased the monthly SNAP benefit level by 15% based on the June 2020 Thrifty Food Plan (TFP) through June 30, 2021; this was then extended through September 30, 2021 under the American Rescue Plan (*PL. 117-2*). On January 22, 2021, President Biden issued an Executive Order asking the USDA to consider updating food assistance benefits to reflect the true cost of a basic healthy diet by beginning the process of revising the TFP to better reflect the modern cost of a healthy basic diet.⁹⁰ This request aligns with, but is bolder than, the 2018 Farm Bill (*PL. 115-334*) requirement that the USDA Secretary re-evaluate and publish the TFP every five years based on dietary guidance, food prices, food consumption data, and consumption patterns.

Cost neutrality is a requirement linked to updating the TFP, meaning that total spending on SNAP benefits must not change as a result.¹⁷³ However, because the Low-Cost Food Plan is about one-quarter more expensive than the TFP, moving from using the TFP to the Low-Cost Food Plan for determining SNAP benefit allotments would result in a higher program cost. This is not supported by existing authorizing statutes and would require an act of Congress to change.¹⁷³ Prior efforts in Congress (e.g., The Closing the Map Gap Act, *H.R. 1368 & S.3719* in the 116th Congress) have tried to amend the Food and Nutrition Act of 2008 (*PL. 88-525*) to require SNAP benefits be based on the Low Cost Food Plan, but have not been successful.

Additional challenges with SNAP benefit adequacy and participation relate to how the program is administered in U.S. territories and on tribal lands. As explained in **Table 3**, in Puerto Rico, American Samoa, and the Commonwealth of the Northern Mariana Islands, SNAP operates as a block grant program (the Nutrition Assistance Program, NAP) where a fixed amount of funds is available for food assistance regardless of total need. Currently, a Congressionally mandated feasibility study is underway to consider transitioning the three U.S. territories to SNAP from NAP. Prior legislative efforts and ongoing litigation have also been attempted to increase benefit adequacy for the three affected U.S. territories. The Food Distribution Program on Indian Reservations (FDPIR) provides another example of limiting program participation and benefit adequacy as tribal members are not allowed to participate in FDPIR and SNAP at the same time, though FDPIR benefits are lower than SNAP benefits (*See Table 3*). As noted earlier, according to reports by the Indigenous Food and Agriculture Initiative, Congress has failed to grant the USDA Food and Nutrition Service the requisite 638 authority to provide tribes with the authority to administer SNAP, among other federal nutrition assistance programs, hindering local program access.¹²²⁻¹²⁴ The 2018 Farm Bill authorized the Tribal Self-Determination Project for FDPIR Food Procurement and Congress appropriated three million to the 638 demonstration project.

Evidence that a change might improve public health

Evidence indicates that the current SNAP benefit allotment is not adequate¹⁷³ and increasing it is likely to reduce food insecurity. Since the TFP does not account for the time cost of food preparation, households would require 40% greater benefits to actually meet the TFP once those costs are included.¹⁶⁸ The temporarily higher SNAP benefit amounts during the American Recovery and Reinvestment Act of 2009 (ARRA, *PL. 111-5*), which increased the average monthly benefit amount from \$96 to \$133 per person (an average increase of 14% per household) for about four years,^{13,174} successfully decreased food insecurity in low-income households and increased food spending.¹⁷⁵ The increase in SNAP benefits from ARRA is also associated with healthier weight outcomes among a sample of SNAP-eligible children and adolescents,¹⁷⁶ though other research from this group did not find these same associations.¹⁷⁷ Another study found ARRA eliminated the end-of-month increase in health care visits for low blood sugar among low-income households.¹⁷⁸

Regarding SNAP benefit issuance, a recent USDA ERS analysis found the receipt of SNAP benefits had a systematic effect on responses to questions in the 12-month food security survey, particularly during the first 10 days and last 6 days of the SNAP month.¹⁷⁹ In a separate study, the USDA ERS found SNAP recipients are most price-conscious and engage in their most successful price-saving efforts soon after benefit receipt, suggesting frequency of benefit receipt may act as a savings commitment device that funds price-saving efforts.¹⁸⁰ Findings from another study suggest that SNAP households in the first week of a benefit month were more likely to purchase fruits and vegetables than those later in the benefit month.¹⁸¹ An additional, emerging consideration regarding SNAP benefit issuance: One study found how retailers located in states with shorter issuance periods (e.g., monthly benefits issued during the first week) market popular items when SNAP benefits are received¹⁸² because most SNAP benefits are spent in the first week of receipt.¹⁸³

As noted earlier, a 2010 feasibility study determined the implementation of SNAP instead of NAP in Puerto Rico would increase the number of households that receive nutrition assistance by 15.3%.¹¹⁶ Regarding FDPIR benefits, as explained earlier, the food benefits distributed to FDPIR participants are significantly less than SNAP benefits; neither program likely provides adequate benefits for tribal members living in remote places, where food tends to be more expensive.¹²⁰ Each month depending on household size, FDPIR provides benefits through a food package while SNAP provides cash benefits through electronic benefits transfer (EBT), which have a greater value than the food package provided through FDPIR.¹⁸⁴ There has not been a nationally representative study of FDPIR since 1989, though there has been many significant changes in the program over the last three decades affecting the benefit adequacy of the program.¹²⁵

Key actions to increase SNAP benefit adequacy

- **Refine the SNAP benefit calculation** – Redefining the TFP is a fundamental step in improving benefit adequacy and is already underway. Congress could also consider legislative changes to base SNAP benefit calculations on the Low-Cost Food Plan or the Moderate-Cost Food Plan.
- **Sustain the 15% benefit increase** – Congress should consider sustaining the 15% increase of SNAP benefits as needed through the pandemic economic recovery and consider ways to make this increase permanent.
- **Evaluate the impact of the 15% benefit increase** – Congress could mandate and appropriate funding for USDA to examine the impacts of the 15% increase in SNAP benefits as well as the SNAP emergency allotments on food security, diet quality, and health outcomes, factoring in expedited Office of Management and Budget approvals as necessary.
- **Advance equity in NAP and FDPIR** – As noted earlier in the report (section on opportunities to increase SNAP participation), Congress could amend the Food and Nutrition Act of 2008 ([PL. 88-525](#)) to transition Puerto Rico, American Samoa, and the Commonwealth of the Northern Mariana Islands from NAP to SNAP.¹¹⁸ Congress could also allow individuals to participate in FDPIR and SNAP in the same month and assess the benefit adequacy of FDPIR to determine if changes are needed to better align SNAP and FDPIR benefits. This assessment should include any temporary and permanent increases in SNAP benefit adequacy. The Healthy Eating Index, which is a measure of diet quality used to assess how well a set of foods aligns with key recommendations of the DGAs, should also be updated with the 2020-2025 edition and then new analyses are needed for assessing FDPIR.^{185,186} In addition, and as mentioned above, Congress could grant the USDA Food and Nutrition Service the requisite 638 authority to allow tribes to administer SNAP directly, among other federal nutrition assistance programs. Congress could also provide the necessary support to USDA to work in collaboration with tribal governments to update the 1989 data still being used to inform FDPIR policy, program, and resource allocations, as well as the 2016 FDPIR participant characteristics and program operation report.

Opportunity: Strengthen Requirements for SNAP-Authorized Retailers to Promote Healthier Retail Food Environments

Current policy landscape

SNAP-authorized retailers are required to either continuously stock a variety of staple foods in four categories (vegetables or fruits; dairy products; meat, poultry or fish; and breads and cereals) (criterion A) or ensure that at least 50% of total gross

retail sales come from staple foods (criterion B).¹⁸⁷ The 2014 Farm Bill ([PL. 113-79](#)) authorized the USDA to update the stocking standards for authorized SNAP retailers, requiring stores to increase their variety of stock (i.e., stores must stock at least seven varieties of staple foods in each of the four staple food categories and stock perishable foods in at least three categories); however, efforts were made to weaken these stocking standards during the 2017 and 2018 Agriculture Appropriations Acts and President Trump's calls for regulatory rollbacks and delays. A 2020 USDA Policy Memorandum indicated how determinations will be made to allow exceptions in areas in which access to SNAP retail locations is limited; essentially stores that do not meet Criterion A or Criterion B are still considered for authorization if they are in an area where SNAP clients have significantly limited access to food.¹⁸⁸ Congress ([PL. 116-260](#)) also recently reinforced through the fiscal year 2021 appropriations process that none of the funds made available by this Act can be used to implement, administer, or enforce the “variety” requirements of the enhancing retailer standards in SNAP final rule ([81 Fed Reg 90675](#)). Regarding SNAP purchasing data, which could provide critical insights into what SNAP participants are purchasing at SNAP authorized stores, a recent U.S. Supreme Court decision upheld that SNAP authorized stores’ annual redemption data is “confidential” within the meaning of the Freedom of Information Act (FOIA).¹⁸⁹ Besides stocking requirements, SNAP-Ed funds can be used to work with SNAP authorized stores, among others, to promote healthier retail food environments, including improving food marketing.^{190,191}

Evidence that a change might improve public health

SNAP authorized stores, which in many cases are convenience stores or small grocers, often offer comparatively less: fresh fruits and vegetables, whole grain-rich foods, and low-fat dairy products in lower-income (high SNAP-eligible) communities than food retailers in higher-income communities.¹⁹²⁻¹⁹⁶ One study examined 57 small stores across four states and found small stores are capable of stocking healthier products but could benefit from technical and infrastructure support, incentives to shift to healthier items, and efforts to drive consumer demand for the healthier products.¹⁹⁷ Establishing minimum stocking standards is a strategy that worked for the USDA Special Supplemental Nutrition Program for Women, Infants, and Children (WIC). That is, the 2009 WIC package reformulation (coupled with subsidies to families to buy more produce and whole grains) incentivized WIC stores to stock these items and encouraged people to buy them.^{198,199}

Evidence suggests food marketing of nutrient-poor and energy-dense foods and beverages disproportionately occurs in communities of color.²⁰⁰⁻²⁰² Regarding food marketing within SNAP stores, one study in three cities in New York State found increases in sugar-sweetened beverage marketing during the SNAP benefit issuance period compared to other days of the

month.¹⁸² A recent report, sharing diverse stakeholder input from Iowa, indicated strong stakeholder support for further work to explore promoting healthy retail marketing strategies and recommended studying the feasibility of including evidence-based product-placement strategies and restrictions on the marketing of unhealthy products by SNAP retailers.²⁰³

Key actions to strengthen requirements for SNAP-authorized retailers to promote healthier retail food environments

- **Promote and facilitate stronger stocking standards and discourage marketing of unhealthy products –** More emphasis from Congress and USDA could be placed on promoting the various benefits to retailers for SNAP authorization including the growing potential for stocking healthier items, while also offering SNAP-authorized stores—particularly non-chain, smaller retailer venues in under-served areas—incentives, capacity building, and technical support to meet stronger stocking standards.²⁰⁴⁻²⁰⁶ Food diversity and food quality should be key considerations. In addition, further attention is needed through the SNAP retailer authorization process, innovative public-private partnerships, federal nutrition education and promotion programs, and more progressive inter-agency collaborations (i.e., USDA, FTC, FDA, CDC) to limit the commercial marketing of foods and beverages that do not align with the latest *Dietary Guidelines for Americans* at SNAP-authorized stores.²⁰⁷
- **Support state waivers to pilot innovative approaches –** Congress could consider supporting state waivers to pilot innovative approaches to promote healthier retail food environments among SNAP-authorized stores, working in conjunction with federal nutrition education and promotion programs (e.g., SNAP-Ed & the Expanded Food and Nutrition Education Program (EFNEP), both to be discussed later). These pilots, along with other federally supported efforts such as ERS analyses and federally supported grants, should be supported to help better understand barriers to providing a breadth and depth of diverse and high quality foods and beverages in socially disadvantaged areas. More evidence is also needed regarding how promoting healthier foods and beverages within SNAP authorized stores impacts the overall retail food environment and food supply for all Americans.
- **Encourage use of retailer and government data to understand SNAP impacts –** Given the recent U.S. Supreme Court ruling that SNAP data is confidential, innovative public-private partnerships are needed to encourage the use of retailer and government data to better understand (1) what SNAP authorized retailers are selling; (2) what SNAP participants are purchasing; and (3) what retailer level innovations have the greatest potential for promoting healthier retail food environments.¹⁸⁹

■ Understand the relationship between improving the U.S. food supply and impacts on the broader retail food environment – Congress could use hearings and funding appropriations to build the evidence base regarding the trickle down effects of promoting healthier foods and beverages within SNAP authorized stores on the overall retail food environment and food supply for all Americans.²⁰⁸ Specifically, studies are needed to identify how to better utilize the Farm Bill to incentivize growing specialty crops, the technical term used for non-commodity crops such as fruits and vegetables, and how to make these items more affordable for all Americans. These analyses could more explicitly explore the benefits to our nation's farmers and how to better utilize the Farm Bill to incentivize growing specialty crops. Potentially building on provisions in the American Rescue Plan (*PL. 117-2*), these analyses could help identify policies, practices, and resource allocations in the next Farm Bill to better align with the latest edition of the *Dietary Guidelines for Americans*.²⁰⁹⁻²¹¹

Opportunity: Ensure More Retailers Are Authorized for Online SNAP

Current policy landscape

Congress mandated Online Purchasing Pilots to test the feasibility of online transactions using SNAP benefits in the 2014 Farm Bill (*PL. 113-79*). FNS then released public comments about the evaluation planned for the two-year online transaction pilots.^{89,212,213} In the 2018 Farm Bill (*PL. 115-334*), Congress required nationwide online acceptance for SNAP benefits after the 2014 Farm Bill pilots were implemented. On April 18, 2019, SNAP participants in the two-year pilot in New York State were the first ever to select and pay for their groceries online.²¹⁴ By March 2021, 46 states and the District of Columbia secured USDA approval to expand online SNAP purchasing⁸⁹ and more than 1.5 million households were using their SNAP benefits to purchase groceries online through participating retailers.²¹⁵ Additional program expansion included an increase in the number of vendors approved to accept benefits online to more than 20 retailers; nonetheless, this is still quite low given there are more than 245,000 SNAP authorized retailers.^{208,216} As part of fiscal year 2021 appropriations and stimulus relief legislation (*PL. 116-260*) as well as the American Rescue Plan (*PL. 117-2*), Congress provided increased investment in technology to modernize EBT, support retailers, including farmers' markets and direct-marketing farmers, and increase access to online purchasing for SNAP participants. Nonetheless, the retailer requirements to provide online purchasing to SNAP households, along with other financial and technology barriers, could be prohibitive for non-chain, smaller retailers.²¹⁷ SNAP benefits cannot currently be used to pay for membership or delivery fees or tips for drivers, although some retailers are currently waiving membership and delivery fees if a minimum purchase is met.^{218,219} But, waiving delivery fees is more challenging for smaller and mid-size retailers.

Evidence that a change might improve public health

The online SNAP purchasing pilot shows promise for increasing healthy purchases by simplifying shopping, expanding grocery options, reducing unhealthy impulse purchases, addressing transportation barriers, and improving visibility of nutrition-related information and healthy cues.²²⁰⁻²²³ Online SNAP can also help with COVID-19 disease mitigation. However, some evidence suggests that concerns around perceived lack of control over selection, produce quality, and cost (e.g., minimum purchasing requirements, delivery fees, lack of delivery availability to certain rural, remote areas) pose barriers to adoption of online grocery shopping and purchasing of fresh foods among SNAP participants.^{221,224,225} Lack of available, affordable, and accessible internet challenges certain communities from using online SNAP, particularly rural communities and remote federal Indian reservations. Indeed, the Federal Communications Commission found 80% of the 24 million American households examined in the targeted rural areas do not have reliable, affordable high-speed internet.²²⁶ A recent study of 12 online grocery websites found that while many stores offered the ability to filter food search results by a nutrition attribute (e.g., food type, ingredient); nevertheless, nutrition fact panels and ingredient information were not always present for foods that require these details on product packaging.²²⁰ Moreover, a nationwide assessment of state responses to the expansion of the SNAP online purchasing pilot in response to the COVID-19 pandemic has found that while most states issued an easily accessible press release (72%) and identified authorized retailers (79%), only a fraction accompanied these resources with health and nutrition-related information.²²³ Others have raised concern about the data privacy requirements set out in the pilot's Request for Volunteers and during the online SNAP expansion might not sufficiently safeguard against predatory marketing practices tailored at an already disadvantaged population.^{227,228} Emerging evidence indicates behavioral economics strategies could help encourage healthier food and beverage choices within SNAP authorized stores, which could have broader impacts on the overall retail food environment for all Americans.²²⁹

Key actions to ensure more retailers are authorized for online SNAP

- **Expand store access** – More attention should be given to expanding vendor participation by non-chain, smaller stores and farmers or farmers' markets, particularly in socially disadvantaged areas, which will require innovative initiatives to better address financial and technological barriers to online SNAP vendor requirements. Promoting universal broadband access particularly in rural areas will be critical; provisions in the American Rescue Plan (*P.L. 117-2*) support this kind of investment. Equally as important, legislative and executive branch efforts should explore other strategies, to reach rural, remote areas, such as enhanced mobile point of sale devices.^{230,231}

■ **Identify the best online ordering mechanism and delivery approaches**

— Despite nationwide expansion of the online SNAP purchasing pilot, SNAP benefits cannot currently be used to pay for membership or delivery fees or tips for drivers. While some larger chain stores are able to waive these fees if a minimum purchase is met, this is prohibitive for many non-chain, smaller retailers. In addition, technology is often a barrier for smaller stores, as is the availability of affordable and accessible internet, particularly in more rural, remote communities. More work remains to consider the best delivery approaches for online SNAP purchased items. For example, modeled after Meals on Wheels,²³² an innovative partnership with AmeriCorps²³³ (or another social servant oriented sector) providing delivery of SNAP items to high-risk individuals and households may be more effective than traditional commercial delivery options with comparatively less experience serving lower income consumers. Other innovative approaches to SNAP delivery could be developed between the USDA and other federal agencies, such as Transportation (DoT), Labor (DoL), and Housing and Urban Development (HUD), that create new jobs for local community members while improving use of online SNAP purchasing. Guided by the recent Congressionally mandated task force, efforts to expand online benefit redemption and home delivery capabilities within WIC will also be important to enable a participant in both programs to use SNAP and WIC benefits for a single food transaction.¹⁹⁹

■ **Raise consumer awareness**

— Further attention should be given to ensuring SNAP participants are aware of the online options available in their state/territory and are provided the technical assistance and other supports necessary to utilize online options. More work remains to ensure online SNAP participants are protected from predatory marketing practices, such as targeted advertisements or data collection. Congress, USDA, and the Biden administration could also work towards better leveraging federal nutrition education and promotion programs, along with principles of behavioral economics to encourage healthier purchases through online platforms.^{228,229}

■ **Understand unintended consequences**

— While the expansion of online shopping stands to address several access barriers for program participants, USDA should also monitor and, if needed, address potential unintended consequences of online expansion on smaller and independent vendors. These examinations should also explore the implications and intersections with promoting local foods and fostering environmental sustainability.

Opportunity: Promote Healthier Purchases With SNAP Benefits Including Online Purchases

Current policy landscape

SNAP benefits can be used to purchase any type of food or beverage, excluding alcoholic beverages, tobacco products, hot prepared food (e.g., rotisserie chicken), and nonfood items (e.g., pet food, soap, cosmetics).²³⁴ Absent an act of Congress, states interested in restricting which items can be purchased with SNAP benefits (such as sugar-sweetened beverages (SSBs) and/or candy) must request a waiver from the USDA. Some states have requested such waivers (e.g., Minnesota, New York, Maine), but all have been denied.¹³ Several incentive programs, primarily aimed at increasing purchases and consumption of locally sourced produce, have been implemented.²³⁵ As detailed in Figure 2, Congress authorized the Healthy Incentives Pilot in 2008, followed by the Food Insecurity Nutrition Incentive (FINI) grant program in 2014. In 2018, the FINI program was renamed the Gus Schumacher Food Insecurity Nutrition Incentive Program (GusNIP), made permanent, and expanded to include produce prescription grants. During COVID-19, Congress (*PL. 116-260*) provided an additional \$75 million for GusNIP, along with additional flexibilities including adjustments to the non-federal funding matching requirement.

Evidence that a change might improve public health

Evidence suggests that restricting SSB purchases in SNAP could reduce the calories consumed from SSBs by 15% and reduce negative health consequences (e.g., obesity prevalence, diabetes).²³⁶ A randomized controlled trial (conducted among individuals eligible or nearly eligible for SNAP but not participating) found that pairing incentives for purchasing more fruits and vegetables with restrictions on the purchase of less nutritious foods (e.g., SSBs, sweet baked goods, candies) improved diet quality, reduced consumption of SSBs and sweets, and increased fruit intake compared with individuals who made purchases with no restrictions or incentives.²³⁷ Research demonstrates that nutrition incentive programs like GusNIP positively impact fruit and vegetable purchasing and intake,^{63-65,238-247} reduce food insecurity,^{239,248} and may help close health equity gaps.²⁴⁹⁻²⁵¹ Notably, one research study found that financial incentives—an intervention providing an immediate 50% discount on qualifying fruits and vegetables—increased weekly spending on qualifying produce by 27%.²⁴³ Another found that providing produce coupons to SNAP participants at corner stores led to 77% of shoppers reporting increases in produce consumption, while participating stores collectively experienced a 288% increase in produce items sold compared to the previous un incentivized year.²⁴⁴ The available evidence on produce prescription programs (many of which are implemented in partnership with healthcare providers)

similarly points to improvements in diet quality²⁵²⁻²⁵⁴ and food security,²⁵⁵⁻²⁵⁷ along with improvements in diet-related health outcomes,^{252,258-260} which in turn reduces healthcare costs.²⁵¹ A recent assessment of two online nutrition incentive pilots highlights both the opportunity that online purchasing presents for increasing SNAP participants' access to healthy foods, and the need to better understand the barriers to adoption (e.g., language, technology, delivery availability) facing elderly, immigrant, rural, and tribal communities to ensure equitable access to benefits.²⁶¹

Key actions to promote healthier purchases with SNAP benefits including online purchases

- **Promote healthier eating patterns** – Nutrition security and diet quality should be incorporated as core objectives of SNAP; such changes will likely require action at both the legislative and executive levels.^{8,262} Strategies should focus on promoting healthier eating patterns among participants, rather than targeting particular foods or beverages. More work remains to ensure equitable access to innovative programs such as GusNIP around the country; this will require additional investments and capacity building in retail food outlets, particularly those located in socially disadvantaged communities.
- **Explore impacts of GusNIP matching requirements** – Congress could explore the role of decreasing or eliminating the current matching requirements for GusNIP grantees (required for nutrition incentives) to better understand if and how these requirements impact socially disadvantaged communities' ability to apply and compete for funding. These analyses should examine whether current requirements unintentionally support better resourced communities and examine how the matching requirements impact the business sustainability of these types of programs. This work could also explore how to better support cost-effective Produce Prescription Program infrastructure to foster participation by a diverse range of customers, retailers, and health care partners.²⁶³
- **Support research to address key gaps** – Further attention should be given to the pairing of incentives for healthy foods and beverages with disincentives or restrictions for less healthy items. One approach might be Congress authorizing USDA to approve state waiver requests and appropriating funds for the evaluation of the approved waivers. Research is also needed to better understand the economic impacts of these programs, as well as longer-term impacts on participants' dietary intake and health outcomes. In addition, impacts on the U.S. food system, with special attention to small and mid-size farms and socially disadvantaged farmers, should also be further examined.²⁶⁴

Opportunity: Increase SNAP-Education Reach and Impact

Current policy landscape

SNAP-Education (SNAP-Ed) is a federally funded grant program that builds partnerships with community organizations to help individuals and households participating in or eligible for SNAP lead healthier lives.²⁶⁵ SNAP-Ed works with a broader suite of federal nutrition and promotion programs, such as the Expanded Food and Nutrition Education Program (EFNEP), which works through the 1862 and 1890 Land-Grant Universities in every state, the District of Columbia, and the U.S. territories. In 2010, the Healthy, Hunger-Free Kids Act (*P.L. 111-296*) expanded SNAP-Ed into a nutrition education and obesity prevention program that now allows funding to go toward policy (e.g., ordinances), systems (e.g., resource allocation), and environmental changes (e.g., observable changes in the built environment); otherwise known as PSE-focused interventions.¹² Congress identified the Centers for Disease and Control and Prevention (CDC) as a critical partner in helping SNAP-Ed make this transition; however, no funding was allocated to CDC to support this major transition. In fiscal year 2016, each USDA FNS Regional Office was charged with establishing a new State Nutrition Action Council (SNAC) or something similar in one State with a high obesity rate, as defined by the CDC.¹⁹⁰ Each SNAC is responsible for creating a plan to help maximize nutrition education efforts and improve coordination and cooperation among State agencies, FNS nutrition assistance programs, public health agencies, and EFNEP. Besides these required states, additional states have been operating a SNAC or a similarly named group for more than 10 years. In addition or instead, several states have now established a SNAP-Ed Advisory Committee that is led by the SNAP State agency. In December 2020, Congress (*P.L. 116-260*) authorized 2% of SNAP-Ed funding through September 30, 2022 be used to establish a stronger federal coordination entity for the program. According to the Indigenous Food and Agriculture Initiative, tribes have been excluded from directly accessing SNAP-Ed funding and from securing direct governmental authority to manage SNAP-Ed.^{121,123}

Evidence that a change might improve public health

Policy, systems, and environmental (PSE)-focused interventions are among the most effective strategies for creating large-scale improvements to the food environment and addressing food security.²⁶⁶ PSE targets have the added benefit of improving the healthfulness of a variety of food-related settings (e.g., child care, schools, food retail outlets, government buildings) shared by SNAP participants and non-participants, potentially resulting in greater public health impact.¹³ Given SNAP-Ed's direct nutrition education activities reach fewer than 15% of SNAP participants, PSE approaches as well as social marketing interventions could potentially expand SNAP-Ed's reach.²⁶⁷ Besides limited reach, direct education may have limited effectiveness due to the fact

that individual behavior change is difficult to achieve without addressing the context in which people make decisions.²⁶⁸ A recent GAO report recommends that USDA improve how it gathers information on SNAP-Ed effectiveness, develop a formal mechanism for coordinating nutrition education across the department, and take steps to fully leverage the department's nutrition expertise for its nutrition education efforts.²⁶⁸

Key actions to increase SNAP-Ed reach and impact

■ Support the shift to more PSE-focused interventions –

Even though SNAP-Ed was expanded over a decade ago to include PSE-focused interventions, no additional funding was allocated to support this program expansion. Congress could explore how to better support successful implementation, evaluation, and sustainability of PSE-focused interventions within SNAP-Ed.^{207,269} As detailed in the recent GAO report,²⁶⁸ work remains within USDA and through public-private partnerships, such as the National Collaborative on Childhood Obesity Research (NCCOR),²⁷⁰ to strengthen the research and evaluation of PSE-focused interventions within SNAP-Ed.

■ Advance tribal governance equity – Congress could authorize SNAP-Ed administrative authority and direct eligibility status to tribes.

■ Promote cultural and contextual competence – Meaningful ways to promote and better integrate cultural and contextual competence across all federal nutrition education and promotion programs should be explored. Without question, community driven approaches (e.g., employing local members of the community to lead key components) are fundamental to successful PSE-focused interventions and are an under-studied economic recovery component of the program.

■ Strengthen program coordination, leadership, and funding – A strategic plan should be created for developing, implementing, evaluating, and sustaining the recent but temporary 2% of SNAP-Ed funding through September 30, 2022 investment in a federal SNAP-Ed coordinating entity. Congress could also consider authorizing USDA to establish a permanent office for SNAP-Ed coordination similar in leadership, funding, and infrastructure to the USDA NIFA GusNIP Training, Technical Assistance, Evaluation and Information Center (NTAE);²⁷¹ USDA FNS SNAP Employment and Training program;²⁷² or the USDA FNS Office of Community Food Systems,²⁷³ among other models. Moreover, Congress and the USDA could consider ways to better support the role of the State Nutrition Action Council (SNAC), as well as foster stronger engagement and evaluation efforts across USDA- and CDC-supported programs at the federal, tribal, territorial, state, and local levels.¹⁹⁰ As one example, SNAP-Ed could better engage with state health departments' nutrition program directors and programs, which are often supported in part by the CDC.

Opportunity: Foster More Resilient Food Systems and Strengthen SNAP's Public Health Impacts Before, During, and After Natural Disasters

Current policy landscape

USDA, in coordination with the Federal Emergency Management Agency (FEMA) and other federal agencies, are responsible for coordinating with state, tribal, and U.S. territorial governments, non-government organizations, and others to support disaster nutrition assistance for affected areas.²⁷⁴ USDA uses a three-pronged approach: (1) congregate feeding, mobilizing resources from USDA Foods; (2) disaster household distribution (allows access of program benefits to normally ineligible households usually for two-week or one-month time periods until Disaster-SNAP (D-SNAP) can be implemented); and (3) D-SNAP, which provides supplemental nutrition assistance similar to SNAP to Americans struggling with hunger in the wake of natural disasters (e.g., hurricanes, wildfires).²⁷⁵ As outlined in Table 2, during the COVID-19 pandemic, Congress authorized a variety of unique adaptations in response to extended school and childcare closures and the financial hardships many families were facing. One example is the creation of the Pandemic Electronic Benefits Transfer Program (P-EBT), which provides funds via SNAP-like EBT cards equivalent to the cost of meals that would otherwise have been consumed at school (and expanded to childcare) to families with children who were eligible for free or reduced-price meals or attending schools participating in the Community Eligibility Provision non-pricing meal service option.⁹¹ USDA also used discretionary COVID-19 relief funding to establish the USDA Farmers to Families Food Box Program, which partnered with national, regional, and local distributors to purchase and distribute agricultural products to Americans in need.²⁷⁶ At the end of May 2021, the Biden administration ended the USDA Farmers to Families Food Box to focus on other means, including a new dairy donation program, a fresh produce box program, among other USDA FNS federal nutrition assistance approaches.²⁷⁷ Outside of immediate disaster response, there is limited federal coordination around strengthening the public health impacts of SNAP before, during, and after natural disasters or around fostering more resilient food systems. The Interagency Committee on Human Nutrition Research (ICHNR) is charged with improving the planning, coordination, and communication among federal agencies in nutrition research and with facilitating the developing and updating of plans for federal research programs to meet current and future domestic and international needs for nutrition.^{278,279}

Evidence that a change might improve public health

USDA Disaster Assistance provides essential food and nutrition resources to vulnerable populations; however, research suggests that more could be done to improve the nutrition quality of our nation's emergency food response before, during, and after natural disasters.^{280,281} In addition, these disaster mechanisms

are likely too short in duration to meet the enormous food insecurity ramifications of these disasters.²⁸² A recent National Academies of Sciences, Engineering, and Medicine (NASEM) rapid expert consultation examined food insecurity, among other food related issues, during the COVID-19 pandemic and acknowledged more work remains to identify best practices for preparedness planning to address food insecurity and food-related disease transmission reduction strategies.²⁸³ Emerging evidence suggests that P-EBT mitigated hunger for 3 million children when schools were closed at the beginning of the pandemic.²⁸⁴ The USDA ERS reported an average of \$8.4 billion in combined SNAP and P-EBT benefits were redeemed per month during April through September 2020—an increase of 86.4% compared to the same period in 2019.²⁸⁵ Regarding the USDA Farmers to Family Food Box, one report that interviewed 30 program stakeholders found the program helped to keep farmers and distributors afloat during the COVID-19 pandemic and distributed millions of food boxes to help reduce food insecurity; however, the program could have done more to support small, mid-sized, minority-, and women-owned farms and food hubs, among other areas for improvement.²⁸⁶ Regarding nutrition research coordination, a 2020 report examined the current landscape for federal nutrition research and identified key opportunities, including strengthening federal food and nutrition coordination during pandemics and building resilient food systems.¹⁴³

Key actions to foster more resilient food systems and strengthening SNAP's public health impacts before, during, and after natural disasters

- **Support stronger infrastructure, authority and coordination around prioritizing nutrition security before, during, and after natural disasters** – Congress could ask the GAO to explore existing or enhanced coordination infrastructures, authority, and coordination mechanisms with the greatest potential to prioritize nutrition security, particularly strengthening the public health impacts of SNAP and Disaster-SNAP before, during, and after natural disasters. This could include a status update or expanded request for the GAO report underway examining food policy and how it connects to public health.²⁸⁷ The GAO could be asked to specifically explore the proposed Office of the National Director of Food and Nutrition, which would be modeled after the Office of the Director of National Intelligence, to provide essential coordination and harmonization of the work of more than 10 U.S. departments and agencies comprising the federal nutrition community.¹⁴³ This Office or, if not established, other White House entities could be charged with developing a National Food Strategy, which would better coordinate our federal approach to food and agricultural law and policy, as has been done in numerous peer countries.²⁸⁸ Congress could also ask about the ongoing contracted research regarding D-SNAP.²⁸⁹

■ Support research to strengthen the emergency food response

Congress should appropriate funding for research to allow real time assessment of emergency food assistance approaches implemented during COVID-19. Such funding would allow innovative approaches like P-EBT to be evaluated for effectiveness and enhanced or improved upon in the short- and long-term, including identifying which federal nutrition assistance waiver flexibilities should be codified for future state, tribal, territorial, and national emergencies.^{152,290-293} Congress could also authorize and appropriate relevant investments to improve the U.S. emergency food relief response. Specific examples of this work include: strengthening investments in monitoring and surveillance of emergency needs and feeding actions; developing a research agenda and the relevant funding mechanisms needed for strengthening the public health impacts of the federal disaster relief response; and investing in strategies to build a more resilient food system.^{294,295}

■ Promote food system sustainability and resiliency –

Congress could commission and appropriate funds to the National Academy of Science, Engineering and Medicine (NASEM) to examine the actions federal nutrition assistance programs could take to effectively nudge participants towards more sustainable eating patterns and identify other ways key stakeholders can foster more resilient food systems.

■ Better leverage the restaurant industry during natural disasters

Congress could further explore through hearings or briefings how to best leverage our restaurant industry to help address our nation's nutrition security while also helping this sector hit hard during pandemic related business closures.²⁹⁶ Historically and during the COVID-19 pandemic, the food service sector have stepped in to provide hot meals to socially disadvantaged communities through the provision of kitchens, cooking equipment, and chefs.^{297,298} More work remains to better leverage their roles for prioritizing nutrition security before, during, and after natural disasters, while ensuring these efforts do not compete with meal-to-go options offered through our USDA Child Nutrition programs.

Additional Opportunities

While outside the primary focus of this report, there are additional opportunities to strengthen the public health impacts of SNAP via the Farm Bill. Key legislative levers or executive actions include but not limited to:

■ Strengthening the public health impacts of the entire federal nutrition safety net

Congress could explore how to strengthen the other federal nutrition safety net programs and other relevant nutrition programs traditionally reauthorized during the Farm Bill listed here and detailed further in Table 1:

- The Food Distribution Program on Indian Reservations (FDPIR),
- The Emergency Food Assistance Program (TEFAP),
- The Fresh Fruit and Vegetable Program (FFVP),
- The Commodity Supplemental Food Program (CSFP),
- The Community Foods Projects (CFP), and
- The Farmers Market and Local Food Promotion Program (FMLFPP).

SNAP participants often participate in other programs in the federal nutrition safety net, as well as the other relevant nutrition programs, such as CFP and FMLFPP.^{9,299} Efforts to strengthen the public health impacts of SNAP should work with similar efforts to strengthen the other 14 programs in the suite of federal nutrition assistance administered by USDA FNS, particularly those reauthorized during the next Farm Bill progress, as well as those traditionally reauthorized through Child Nutrition Reauthorization.³⁰⁰

■ Improving the implementation of the *Dietary Guidelines for Americans* across the federal nutrition safety net

Congress could explore how to improve the *Dietary Guidelines for Americans* development and implementation processes, particularly through SNAP and SNAP-Ed.¹⁴³ The DGAs are the cornerstone of all federal nutrition policy (*P.L. 101-445*) but the implementation of the *Dietary Guidelines for Americans* across the federal nutrition safety net is constrained by limited funding and dedicated staff.¹⁴³ Similarly, limited funding has hindered adequate and consistent investments into the fundamental research, monitoring, and surveillance processes needed to develop and translate dietary guidance, including a special emphasis on SNAP participants and/or SNAP eligible participants. These knowledge gaps are problematic given the increasing diversity of our country, who disproportionately bear the burden of diet-related chronic diseases and their intersections with food insecurity. More work remains to ensure dietary guidance is effectively translated into culturally and contextually sensitive messages, through appropriate mediums and modes, to our nation's most socially disadvantaged populations.

■ Strengthening the evidence-base and translation of evidence into action across our federal nutrition safety net

Congress could consider ways to strengthen federal nutrition research, which underpins our efforts to develop evidence-based policy, programmatic, and resource allocation decisions to strengthen the public health impacts of our federal nutrition safety net. A 2020 report identified significant national nutrition research and translation challenges relevant to strengthening the public health impacts of our federal nutrition safety net.¹⁴³ These include how federal coordination remains suboptimal, documented by multiple governmental reports over the last 50 years. Greater harmonization and expansion of federal investment

in nutrition science could help build the evidence-base and accelerate the translation of evidence into action with the greatest potential to strengthen the public health impacts of our federal nutrition safety net. Identified strategies in the 2020 report to strengthen national nutrition research include: (1) establishing a new authority for robust cross-governmental coordination of nutrition research and other nutrition-related policy, including federal nutrition assistance and (2) strengthening the authority, investment, and coordination from nutrition research within the National Institutes of

Health (NIH), the largest funder of federal nutrition research. The 2020-2030 Strategic Plan for NIH Nutrition Research does not explicitly discuss stimulating discovery or innovation to support efforts to strengthen the public health impacts of our federal nutrition safety net.³⁰¹ Congress could also assess the short- and long-term workforce development needs at the USDA ERS and NIFA after the controversial and rapid relocation of both of these agencies from Washington, DC to Kansas City, Missouri, which significantly altered staffing at both agencies.³⁰²

Conclusions

SNAP offers a vital lifeline to millions of Americans. The size and reach of SNAP suggests that policy changes via the next Farm Bill can meaningfully promote food and nutrition security and improve public health, while having additional co-benefits, such as lifting SNAP participants out of poverty, reducing health care expenditures, increasing purchases of fruits and vegetables, expanding local and regional food economies, creating jobs, promoting opportunity in rural and tribal communities, promoting racial equity, and, with more targeted efforts and research, mitigating climate change.^{303,304} Recognizing that the policy landscape is likely to evolve over

the next few years due to the COVID-19 pandemic response and recovery, work remains to identify the best path forward to strengthen the public health impacts of SNAP in the next Farm Bill. Dedicated funds to evaluate the relevant COVID-19 program adaptations and conduct the necessary consensus building across key stakeholders will be instrumental. Additional research and evaluation resources to monitor program impacts and evaluate emerging innovations is also warranted to better understand what is working and not working and to make course adjustments along the way.

Acknowledgments

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S.B. conceived of the report and the Radcliffe Institute for Advanced Study at Harvard University Virtual Convening on February 9 and 10, 2021, which helped inform the recommendations in the report. In total, this four-hour Convening, entitled the same as this report and detailed in the enclosed agenda, brought together more than 30 stakeholders, representing diverse expertise including but not limited to hunger relief/charitable food, advocacy, agriculture and sustainability, equity, and state government. The Convening participants were provided a draft outline of the report that identified initial thoughts on key opportunities for strengthening the public health impacts of SNAP via the Farm Bill. S.B., S.F., K.S., and C.D. carried out the convening logistics in consultation with C.W., A.Y., and E.B. All members of the author team helped facilitate convening topical session breakout room discussions and helped to ensure the perspectives shared were integrated into the final version of the report. S.F. and S.B. led the drafting and revising of the report, which were informed by a *law review* examining legislative and executive branch development affecting SNAP and a *review* on policy options to strengthen the public health impact of SNAP, along with more recent COVID-19 specific activities including but not limited to an *op-ed* on the need to increase the SNAP benefit amount, an *HER research brief* on SNAP benefit adequacy, and a *perspective* regarding feeding children during these unprecedented times. K.S. managed references,

provided editorial support, and coordinated the revision process. In alphabetical order, E.B., C.D., C.W., and A.Y. provided substantial input throughout various drafts. Jane Dai designed the graphics. We thank the Convening participants who provided instrumental insights regarding key policy levers and suggested paths forward for strengthening the public health impacts of SNAP via the Farm Bill and other vehicles. We are also grateful to Angie Tagtow, MS, RDN, LD for her review of the SNAP benefit adequacy policy landscape.

Funding: Healthy Eating Research (HER), a national program of the Robert Wood Johnson Foundation (RWJF), supported the peer-review and dissemination process of this report, along with notetaking support for the Radcliffe Convening breakout room discussions. The Radcliffe Institute for Advanced Study at Harvard University supported the convening logistics, including small gifts of gratitude to the participants and a stipend to K.S.

Peer-Reviewers: Joseph Llobrera, PhD, MA; Lisa Pino, JD, MA; and Hilary Seligman, MD, MAS

Disclaimers: The views put forth in this report and corresponding executive summary are by the authors and do not necessarily represent the views of HER and RWJF. The views expressed in this report by Drs. Bleich, Dunn, and Fleischhacker, who each recently transitioned to the federal government, are solely the personal views of those authors. Participation in the Convening does not reflect an endorsement of this report.

Suggested Citation: Bleich SN, Sullivan K, Broad Leib E, Dunn CG, Woteki C, Yaroch AL, Fleischhacker S. Technical Report. Strengthening the Public Health Impacts of SNAP: Key Opportunities for the Next Farm Bill. Durham, NC: Healthy Eating Research; 2021. Available at: healthyeatingresearch.org.

The executive summary can be found at:
healthyeatingresearch.org/research/strengthening-the-public-health-impacts-of-snap-key-opportunities-for-the-next-farm-bill

Virtual Convening Agenda

Day 1: Tuesday, February 9, 2021 (times are ET)

10-10:05 am	Welcome <i>Sean O'Donnell, Radcliffe Institute for Advanced Study at Harvard University</i>
10:05-10:25 am	Introductory remarks <i>Sara Bleich, Harvard Chan School of Public Health</i>
	Opening remarks: <ul style="list-style-type: none">■ An overview of the purpose and process for the convening■ Author introductions
	Overview of the report and opportunity areas for strengthening the public health impacts of SNAP in the next Farm Bill: <ul style="list-style-type: none">■ Increase SNAP participation■ Increase SNAP benefit adequacy■ Strengthen requirements for SNAP-authorized retailers to promote healthier retail food environments■ Ensure more retailers are authorized for online SNAP■ Promote healthier purchases with SNAP benefits including online purchases■ Increase SNAP-Ed reach and impact■ Strengthen the public health impacts of SNAP during disasters and through resilient food systems
10:25-10:40 am	Breakout #1: Reflections on the opportunity areas
	Brief small group discussions to share reactions to the opportunity areas, including: <ol style="list-style-type: none">1. How do the identified opportunities align with your thoughts on the SNAP relevant opportunities for the next Farm Bill?2. Should any of the opportunities be rephrased, combined, etc.?3. Are any key opportunities for strengthening the public health impacts of SNAP missing?
10:40-10:55 am	Recap feedback on opportunity areas as a large group
	Regroup in plenary to share and incorporate feedback on the opportunity areas based on small group discussions
10:55-11:25 am	Breakout #2: Developing a path forward for each of the opportunity areas
	Participants will convene in small groups, with each group focused on a specific opportunity area. The goal for each small group is to brainstorm policy and/or research recommendations to move the needle in their respective opportunity area. Discussion prompts: <ol style="list-style-type: none">1. Do you have feedback on the author team's proposed path forward within your opportunity area? Are there places where any of the recommendations could be strengthened?2. Within your opportunity area, what are additional policy levers that can help improve the public health impacts of SNAP? For each, please identify current policy, evidence you are aware of indicating that a change may positively influence food insecurity and promote health equity, and concrete suggestions for accelerating movement going forward.3. Within your opportunity area, are there key research gaps, which can inform the policy debate? Specifically, are there topics we should encourage the research community to prioritize over the next 2 to 3 years (this could include translation and dissemination of existing research too)?
11:25-11:55 am	Full group discussion about paths forward for the opportunity areas Each small group will report back on their ideas for strengthening the public health impacts of SNAP in their opportunity area
11:55 am-12 pm noon	Day 1 synthesis and closing remarks <i>Sara Bleich, Harvard Chan School of Public Health</i>

Day 2: Wednesday, February 10, 2021 (times are ET)

10-10:15 am	Recap key takeaways from Day 1 <i>Sara Bleich, Harvard Chan School of Public Health</i>
10:15-10:45 am	Breakout #3: Additional opportunities to strengthen the public health impacts of federal nutrition programs Participants will break into small groups to brainstorm additional opportunities for SNAP via other legislative levers and for other nutrition assistance programs via the Farm Bill. Discussion prompts: 1. Can you think of other opportunities to strengthen the public health impacts of SNAP via the Farm Bill or other legislative levers? 2. What opportunities are there to strengthen other nutrition assistance programs and other programs (e.g., competitive grant programs) also included in the Farm Bill: <ul style="list-style-type: none">■ Fresh Fruit and Vegetable Program (FFVP)■ Senior Farmers' Market (SFMNP) Nutrition Program■ Food Distribution Program on Indian Reservations (FDPIR)■ The Emergency Food Assistance Program (TEFAP)■ Commodity Supplemental Food Program (CSFP)■ Gus Schumacher Nutrition Incentive Program (GusNIP)■ Community Food Projects (CFP) Competitive Grants Program■ Healthy Food Financing Initiative (HFFI)
10:45-11:15 am	Group discussion about additional opportunities Each small group will report back on their ideas for strengthening the public health impacts of SNAP and other nutrition assistance programs via the Farm Bill or other legislative levers
11:15-11:45 am	Large group discussion around key policy levers Spend time as a large group discussing the full list of policy levers identified on Day 1, with the goal of refining recommendations around: <ol style="list-style-type: none">1. How to operationalize them2. Potential points of friction3. Things that would need to be prioritized to move them forward4. Key knowledge/evidence gaps that need to be filled
11:45 am-12 pm noon	Convening synthesis and closing remarks <i>Sara Bleich, Harvard Chan School of Public Health</i>

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About Healthy Eating Research

Healthy Eating Research (HER) is a national program of the Robert Wood Johnson Foundation. Technical assistance and direction are provided by Duke University under the direction of Mary Story PhD, RD, program director, and Megan Lott, MPH, RDN, deputy director. HER supports research to identify, analyze, and evaluate environmental and policy strategies that can promote healthy eating among children and prevent childhood obesity. Special emphasis is given to research projects that benefit children and adolescents and their families, especially among lower-income and racial and ethnic minority population groups that are at highest risk for poor health and well-being and nutrition-related health disparities. For more information, visit www.healthyeatingresearch.org or follow HER on Twitter at [@HEResearch](https://twitter.com/HEResearch).

Healthy Eating Research

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