

Implementing SNAP During the COVID-19 Pandemic: Perspectives from the National Network of State SNAP Administrators

Research Brief, September 2022

Background

The United States Department of Agriculture (USDA) Supplemental Nutrition Assistance Program (SNAP) is the nation's largest anti-hunger program. In fiscal year 2021, SNAP provided monthly financial benefits to purchase food to more than 41 million people; in 2018, nearly half of participating households included children.^{1,2} To be eligible for SNAP, individuals must meet certain resource and income thresholds for their household (generally, below 130 percent of the U.S. federal poverty level) and comply with work requirements.³ Eligible individuals can participate in SNAP by applying to their state agency and participating in an interview. Verified households receive a monthly benefit allotment on an Electronic Benefit Transfer (EBT) card, which can be used to purchase groceries at participating retailers. Evidence supports SNAP's efficacy in reducing poverty and food insecurity; however, opportunities remain to expand participation among underserved groups, enhance benefit adequacy, and reduce the administrative burden of applying for and staying on SNAP.^{4,5}

SNAP was a critical component of the COVID-19 pandemic response.⁶ Between February and May 2020, SNAP applications increased by more than 17% — the largest three-month increase in applications in the program's history.^{7,8} The pandemic fundamentally altered how SNAP agencies deliver benefits, interact with participants, and provide supportive services (**Exhibit 1**). In March-May 2020, many agencies rapidly shifted from in-person to remote application processing, client communications, and nutrition education. Beginning in March 2020, Congress passed legislation and USDA issued guidance allowing states to modify their administrative processes to accommodate the unprecedented increase in SNAP applications and shift to remote work (**Exhibit 2**).^{1,2} Innovation in program implementation during the COVID-19 pandemic could improve SNAP in future emergencies and longer term.



Exhibit 1.
Description of SNAP Supportive Services

Service	Description
Education (SNAP-Ed)⁹	Promotes healthy, active, lives in low-income communities. Participation is voluntary. Activities may include direct education or policy, systems, and environmental interventions.
Employment & Training (E&T)¹⁰	Provides job training, skill development, and other support (e.g., child care, transportation), to SNAP participants seeking employment. It is voluntary in some states and mandatory for certain participants in others.
Outreach¹¹	Provides information to eligible people with low incomes not currently participating in SNAP.

Implementation

Supportive services are administered by state agencies, often in partnership with collaborating organizations, implementing agencies, or contractors. Activities must adhere to approved state plans to receive federal reimbursement.

Exhibit 2.

Key Program Modifications Affecting SNAP Administration During the COVID-19 Pandemic, 2020-2021

Policy Area	Program Modification	Description
Expanded eligibility	Suspended work requirements ¹³	From April 2020 through the month after the end of the national public health emergency, the Families First Coronavirus Response Act (FFCRA) partially suspended the three-month time limit on SNAP participation for individuals not complying with work requirements.
	Expanded eligibility for college students ¹⁴	From January 2021 through the month after the end of the national public health emergency, the Consolidated Appropriations Act of 2021 expanded SNAP participation to students eligible for work study with no expected family contribution in the current year.
Enhanced benefits	Issued emergency allotments ¹⁵	The FFCRA authorized states to issue supplemental benefits bringing households to the maximum benefit amount for their household size, providing both a state and national public health emergency declaration is in effect. ¹ Beginning in April 2021, households already eligible to receive the maximum amount received an additional \$95/month.
	Temporarily increased benefits 15% ¹⁶	The American Rescue Plan increased SNAP benefits by an average of \$27/household/month through September 2021.
	Increased benefits 21% ¹⁷	In August 2021, the USDA updated the Thrifty Food Plan, increasing SNAP benefits by an average of \$1.20/person/day beginning in October 2021.
	Expanded online purchasing ^{18,19}	The USDA expedited the expansion of the SNAP Online Purchasing Pilot, which allows use of SNAP EBT for online grocery transactions.
Streamlined case processing	Extended certification periods and periodic reporting ²⁰	The FFCRA allowed states to extend certification periods and periodic reports, initially by six months, and later according to states' needs. This allowed for cases to remain active without additional verification.
	Waived interview requirements ²¹	The FFCRA allowed states to waive the requirement to provide face-to-face interviews upon applicant request and to waive interviews at initial application and recertification under certain conditions.
	Enabled lower-burden telephonic signatures ²²	The FFCRA allowed states to document in writing the verbal attestation of a client in place of an audio-recorded signature.

Objectives

In September 2020–May 2021, the Johns Hopkins Bloomberg School of Public Health (JHSPH) and the American Public Human Services Agency (APHSA) partnered to describe state implementation of SNAP in the first year of the COVID-19 pandemic.^{23–26} Specifically, the research sought to:

1. Characterize state implementation of SNAP and its supportive services, including SNAP-Ed, Outreach, and E&T.
2. Describe barriers and facilitators to SNAP implementation, from the perspectives of state program leadership.
3. Generate recommendations from SNAP administrators about how to better prepare SNAP for future emergencies and improve program administration longer term.

Methods

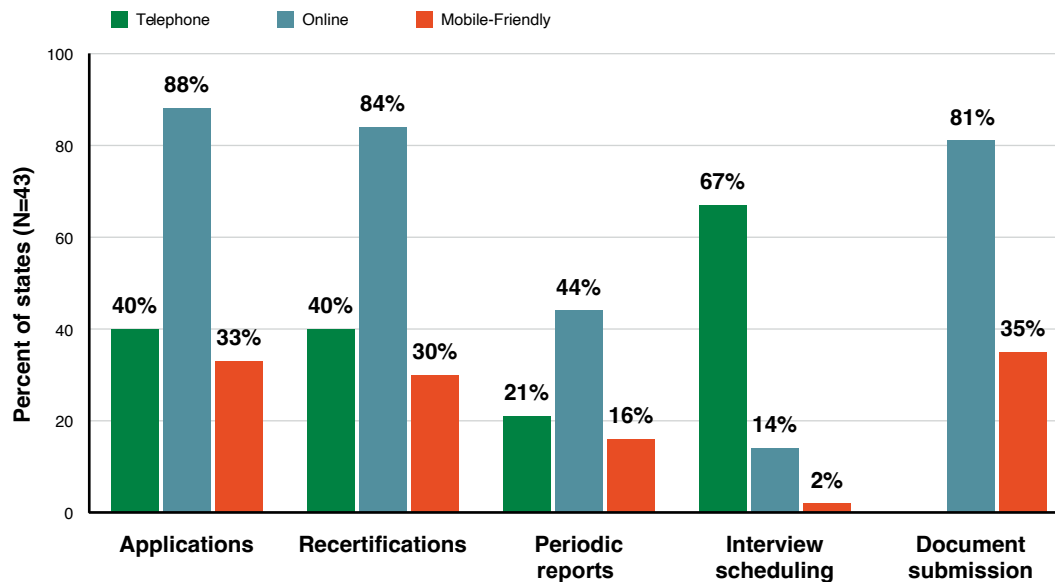
1. **Nationwide survey of SNAP-administering agencies:** A 121-item, pilot-tested, web-based survey was sent to SNAP directors in all 50 states and Washington, D.C., on December 14, 2020, and remained open until January 29, 2021. The survey included questions about USDA waiver uptake, program modifications, and implementation of SNAP-Ed, Outreach, and E&T in the first calendar year of the pandemic. Forty-three states responded to the survey.
2. **Focus groups with state SNAP directors and supportive services supervisors:** Seven focus groups were conducted with 62 participants from 26 states in April 2021 to add depth to survey responses and describe program modifications since the survey closed in January 2021. Four focus group discussions addressed SNAP administration (application processing and benefit issuance); one discussion focused on SNAP-Ed; one discussion focused on SNAP Outreach; and one discussion focused on SNAP E&T. Invitations were sent to all 50 states, with targeted, personalized follow-up sent to states that did not participate in the survey.

Key Findings

- **Federal waivers to adjust interview requirements, extend certification periods and periodic reports, and waive audio recordings for telephonic signatures were viewed by many state administrators as critical flexibilities for managing caseloads, streamlining operations, and improving access to SNAP benefits for eligible households.** However, these waivers were not universally utilized for various reasons, including: (1) smaller impact of the pandemic on SNAP caseloads in some states; (2) availability of technology to more easily transition staff to telework and manage caseloads remotely; and (3) lack of staff or information technology (IT) resources to implement waivers. In some states, staff and IT resources needed to implement SNAP waivers were limited due to natural disasters requiring activation of Disaster-SNAP and other pandemic-related changes, such as implementation of Pandemic-EBT.
- **The waiver to extend certification periods and adjust periodic reports was used by the vast majority of states early in the pandemic, but utilization dropped off in the summer and early fall of 2020.** Many state administrators expressed that the requirement to extend cases by six months created challenges, doubling their workload when extended cases became due. In states that aligned certification periods across multiple programs (e.g., SNAP and Medicaid), misalignment between extensions for SNAP and other programs reduced administrative efficiency. The version of the extended certifications waiver authorized under the October 2020 Continuing Resolution, which gave greater flexibility to states to decide how to extend existing cases, was almost universally preferred by state administrators.
- **The temporary waiver of quality control reviews, which are used to generate payment error rates, was viewed as critical for facilitating SNAP adaptations without fear of consequences.** State agencies face penalties if their payment error rates exceed certain levels set by the USDA, and many SNAP administrators were concerned that the combined effects of telework, increased caseloads, and implementation of program modifications would increase payment errors. Many state administrators expressed that this waiver should be extended, as program changes made in response to the pandemic may have implications for payment errors in subsequent fiscal years.

Exhibit 3.

Options Available to Support SNAP Case Functions Prior to March 2020



- **State agencies with modernized technology fared better than those with older systems.** Technology upgrades were ubiquitously viewed as important for quickly and efficiently communicating frequent program changes to clients, transitioning to remote application processing, modifying eligibility systems to implement federal waivers, and shifting in-person programming (e.g., SNAP-Ed, E&T) to a virtual setting. Although the majority of states offered online services prior to the pandemic, few offered mobile-friendly services. Very few (1-3 states for each case function), were able to add or expand mobile-friendly services during the time period studied (Exhibit 3).
- **Many state agencies leveraged existing relationships with community partners, professional organizations, and other state agencies to fill program gaps.** Community organizations, including SNAP Outreach partners, were viewed by SNAP administrators as important for: (1) reaching eligible households with poorer access to remote services (e.g., unhoused individuals and those in rural and tribal areas); (2) funding activities not reimbursable through SNAP (e.g., loaner laptop programs, expansion of wireless internet access, food distribution to facilitate virtual nutrition education); and (3) translating materials to communicate frequent program changes with clients. Other state agencies and professional organizations assisted with interpreting FNS guidance and sharing successful waiver requests.
- **Additional administrative funding was greatly needed to support staff transition to telework, adjustments to remote service delivery, and implementation of federal waivers.** The unanticipated implementation of Pandemic-EBT placed significant financial burden on already strapped state agencies.
- **SNAP administrators agreed that the emergency allotments, benefit increases, and revisions to the Thrifty Food Plan improved benefit adequacy, but a more organized response was needed earlier in the pandemic to minimize administrative burden and reduce client confusion.**
- **Many SNAP administrators and SNAP-Ed, Outreach, and E&T supervisors expressed that the pandemic brought inequities in service delivery to the forefront.** Respondents described a desire to modify existing procedures and generate new best practices to improve equity. Recommendations included: (1) ensuring those without internet have access to SNAP benefits and services; (2) developing a transition plan to ease participants back to their regular benefit amount after the public health emergency ends; (3) testing new strategies to reduce administrative burden by waiving interview requirements for certain households; (4) aligning SNAP with other human services programs to improve benefit coverage and administrative efficiency; and (5) aligning SNAP supportive services to improve participant experience and engagement.

Conclusions

SNAP administrators and supportive services supervisors shifted from primarily in-person to remote programs during the COVID-19 pandemic. Federal waivers and program flexibilities were viewed as critical, particularly those intended to improve caseload management, improve benefit adequacy, and reduce penalties for payment errors. Many challenges to implementing program adaptations were highlighted, including outdated technology systems, limited staff capacity and administrative funding, rigid program rules and guidance, difficulty communicating frequent program changes with clients, and competition for resources from jointly administered programs (e.g., Pandemic-EBT). By contrast, modernized technology systems, availability of virtual programming, existing community partnerships, and enhanced benefits facilitated SNAP implementation. In the future, investments in technology and streamlined administrative operations may improve outcomes for SNAP participants and staff.

Policy Recommendations

In Future Emergencies:

- **Codify authority for waiver flexibilities that are triggered during state or national emergencies.** By codifying waiver flexibilities for future emergencies, states could automatically implement needed program changes in a timely manner rather than awaiting approval from USDA. Program flexibilities that allow states to streamline application processes, universally increase benefits, and waive quality control reviews would improve benefit access and adequacy in emergencies. Congress should authorize supplemental emergency administrative funding to meet increased staffing and technology demands.

Long-Term Modernization:

- **Authorize demonstration projects to test streamlined administrative procedures.** Strategies to permanently waive interview requirements for certain households or simplify recertification processes may improve outcomes, such as benefit retention and payment accuracy, for both participants and program staff.
- **Appropriate funding for technology upgrades.** Investments in modernized, integrated eligibility systems, mobile-friendly case processing, online ordering and virtual payment methods, and electronic modes of client communication are just a few examples of ways in which Congress and USDA could accelerate SNAP modernization. These improvements will not only help state agencies quickly adapt their programs during emergencies but may also improve the experiences of clients and staff during normal operations.
- **Build the evidence base for virtual services.** USDA should prioritize research to evaluate virtual services, including remote client communications and delivery of supportive services (i.e., SNAP-Ed, E&T). Particular emphasis should be given to the needs of underserved groups, including those lacking reliable access to internet and digital devices.



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- Bresnahan C, Ellison C, Green C, Headrick G, Lee CJY, Lyons M, Moran A, Tse J. SNAP Waivers and Adaptations During the COVID-19 Pandemic: A Survey of State Agency Perspectives in 2020. Baltimore, MD: Johns Hopkins Bloomberg School of Public Health, 2021. https://healthyeatingresearch.org/wp-content/uploads/2021/06/SNAPWaivers_FullReport_FINAL_Linked.pdf. Accessed May 15, 2022.
- Bresnahan C, Ellison C, Green C, Headrick G, Lee CJY, Lyons M, Moran A, Tse J. Executive Summary: SNAP Waivers and Adaptations During the COVID-19 Pandemic: A Survey of State Agency Perspectives in 2020. Baltimore, MD: Johns Hopkins Bloomberg School of Public Health, 2021. https://healthyeatingresearch.org/wordpress/wp-content/uploads/2021/06/SNAPWaivers_ExecutiveSummary_FINAL.pdf. Accessed May 15, 2022.
- Headrick G, Ellison C, Bresnahan C, Green C, Lyons M, Moran A. State Implementation of SNAP Waivers and Flexibilities During the COVID-19 Pandemic: Perspectives from State Agency Leaders. In Press, *Journal of Nutrition Education and Behavior*. <https://www.sciencedirect.com/science/article/pii/S1499404622004559?dgcid=author>

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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 [@HERResearch](https://twitter.com/HERResearch).

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