

## Policy Co-Creation with SNAP Participants

People with lived expertise in using SNAP are uniquely qualified to determine how policies and interventions can help participants purchase foods that meet their needs and improve shopping experiences.

Failing to engage with SNAP participants when designing policies can result in practices that harm the program's users. For example, in a misguided attempt to curb fraud within the program, Massachusetts passed a bill in 2013 that required SNAP users' photos to be on their electronic benefit transfer (EBT) cards, and guidance on the policy was issued without a public hearing or the opportunity for a public comment.<sup>1,2</sup> This policy was not found to have an effect on SNAP benefit trafficking, and increased stigma for shoppers using SNAP EBT cards.

When input from the population who will be most impacted is considered during policy design and implementation, the outcome is much more likely to be successful. An example of this occurred in 2011 when the Healthy Incentives Pilot (HIP) was launched to determine if incentives for fruits and vegetables offered at the point-of-sale would help increase purchases.<sup>3</sup> The HIP researchers continually conducted surveys and focus groups with participants to ensure that the program met their needs. Through this feedback, they learned that participants were not aware that resources for incentives were available and that the program was difficult to understand.<sup>4</sup> This input helped improve and shape the program and cultivate positive feelings towards purchasing fruits and vegetables. Findings from HIP laid the groundwork for the Gus Schumacher Nutrition Incentive Program (GusNIP), a national grant program for SNAP fruit and vegetable incentives.<sup>5</sup>

### *CSPI's model for SNAP community engagement*

In 2018, CSPI developed a model for statewide community engagement in which SNAP participants and stakeholders lead the development of SNAP policy priorities to improve food and nutrition security according to which interventions may work best for their community. In 2021, we issued funding to seven community-based organizations to implement the model in their states and identify healthy SNAP priority policies.

The model can be tailored to the needs of a given state. Data gathered from the engagement project can be shared with researchers, policymakers, and other key stakeholders to inform the potential impact, feasibility, barriers, and support for various SNAP healthy eating strategies.

Key components of the community engagement model include:

- **Advisory committee:** establishing regional or statewide advisory committees composed of local stakeholders with expertise in SNAP

- **Focus Groups:** engaging SNAP participants through focus groups or interviews early in the conceptualization of the project so their insights help guide subsequent discussions. Focus group discussion guides should assess the degree to which SNAP meets participants nutritional needs and determine what participants' priorities are for improving the program.
  - Focus group participants might include current SNAP participants and SNAP-eligible non-participants, and specific communities, such as participants living in rural and urban locations, and immigrants to the U.S.
- **Key Informant Interviews:** key informants can weigh in on focus group recommendations. Their input can help identify facilitators and barriers to specific proposed pilots or policy changes and assess the feasibility of recommended SNAP strategies. Interviewees can be statewide or regional experts on SNAP.
- **Convenings:** stakeholder convenings bring professionals together from different sectors to discuss strategies recommended by SNAP participants and build support across diverse sectors. Stakeholders may include professionals from the nutrition, public health, anti-hunger, research, and government sectors, as well as SNAP participants.
- **Polling:** some states have chosen to conduct polling of both SNAP participants and the general public to assess support for nutrition-oriented SNAP strategies as well as differences in opinion between the public and SNAP participants. Polling also provides insight on demographic breakdown of policy support.
- **Policy recommendation report:** The final results of the project should be compiled into a report that summarizes the policy recommendations. Including direct quotes from focus groups and key informant interviews can effectively illustrate different perspectives on SNAP strategies. The report can be shared with policymakers, advocates, and project participants to drive future research, pilots, and policy.

### *Best practices for co-creating policy with SNAP participants*

From our work, we've identified the following best practices for creating policy with communities:

- Create safe spaces to engage with communities
  - Working with communities to co-create policies means being intentionally adaptable to their needs. Be mindful of who may be historically left out of the policy conversations and ensure those voices are at the table.
  - Immigrants who use SNAP or are SNAP-eligible may be especially in need of safe spaces to discuss changes to the program. Using certain public benefits can contribute to individuals being considered a "public charge," a designation that prevents individuals from qualifying for a green card. Using SNAP does not in fact contribute to the public charge determination, but many immigrant families avoid using SNAP out of an abundance of caution, increasing their risk for food insecurity.<sup>6</sup>
- Compensate SNAP participants for sharing their experiences with the program

- SNAP participants should be compensated for the time and expertise they contribute to policy discussions.
- The type of compensation given should be considered prior to engagement. For example, people who do not have reliable access to email may not prefer electronic payments.
- One concern for SNAP participants is being able to be compensated for their work without reaching the SNAP benefit cliff, or the point at which they are no longer eligible for SNAP based on a small increase in income. If providing cash is not feasible, providing certain types of gift cards may be appropriate compensation. USDA Food and Nutrition Service issued guidance around providing gift cards in the resource test for SNAP participants.<sup>7</sup>
- Identify a clear path for how the information shared by communities can be mutually beneficial
  - Community members are likely to have a positive experience with giving their opinions when they know that their contributions serve towards a larger goal, such as informing advocacy and changing policy to better support those most impacted.
- Ensure that community engagement is maintained throughout policy design and enactment
  - This can include continually conducting listening sessions and town halls focused on the community's needs and employing people with lived expertise.

### *SNAP policy priorities identified through community engagement projects*

CSPI has supported statewide SNAP community engagement projects across the country, including in Arkansas, Colorado, Florida, Iowa, Massachusetts, North Carolina, Ohio, Pennsylvania, and Texas. As of spring 2022, projects are ongoing in Connecticut and Michigan.

Across all SNAP participants and stakeholders in these states, there was high support for increasing SNAP benefits, increasing SNAP's purchasing power for nutritious foods (through expanding SNAP fruit and vegetable incentive programs), and creating healthier food retail environments (through highlighting healthy items through marketing or product placement, or increasing variety of healthy options).

For more information about these projects and recommendations, view the full reports linked here and see the tables below.

- [Engaging Arkansas Stakeholders to Improve SNAP's Public Health Impact](#)
- [Colorado Listening Project: Perspectives of SNAP Participants and College Students to Maximize Nutrition Security](#)
- [Strategies to Improve Healthy Eating in SNAP: An Iowa Perspective](#)
- [Recommendations for a Healthy Eating SNAP Pilot in Massachusetts](#)
- [Recommendations for a Healthy Eating SNAP Pilot in North Carolina](#)
- [Recommendations for a Healthy Eating SNAP Pilot in Pennsylvania](#)

## Focus groups and interviews that assess support for SNAP strategies by SNAP participants

All of the community engagement projects included focus groups and/or interviews with SNAP participants. The table below summarizes SNAP participant feedback about various strategies for improving food and nutrition security through SNAP.

Author, year	Participants	Benefit increase	Fruit and vegetable (FV) incentive	Retail food environment	SSBs not allowed in SNAP	Combined FV incentive + SSBs not in SNAP	Other
Children’s Defense Fund-Ohio, 2022 (link pending)	86 Ohioans who use SNAP, are SNAP-eligible, or have used SNAP within the last year	<b>All participants strongly supported</b> increasing SNAP benefit amounts.	There was <b>strong support</b> for expanding FV incentives to more retailers and to incentivize other types of healthy foods.	There was <b>some support</b> to allow SNAP benefits to purchase hot, prepared foods.	<i>This strategy was not discussed by SNAP participants.</i>	There was <b>some support</b> for this strategy, but others felt that a disincentive increased stigma.	<b>Most participants opposed</b> a SSB tax with revenue supporting SNAP participants.
Sustainable Food Center, 2022 (link pending)	43 Texans who currently use SNAP or have been previously enrolled	<b>All participants supported</b> increased funds for food.	There was <b>high support</b> for expanding FV incentives.	There was <b>some support</b> to allow SNAP benefits to purchase hot, prepared foods.	Most participants <b>supported</b> SSB restrictions because they did not drink SSBs, but some did not like having their purchase options limited.	Participants were <b>supportive</b> of this strategy.	Participants <b>opposed</b> a <b>statewide</b> SSB tax with revenue support FV purchases for SNAP participants. There was <b>general support</b> for SSB taxes to fund FV incentives at the <b>city and county level</b> .
<a href="#">Nourish Colorado and Colorado Farm and Food Alliance, 2022</a>	52 Coloradans who use SNAP (including 12 college students)	The <b>overwhelming majority of participants</b> stated that SNAP dollars do not meet their families’ nutritional needs.	For those who have used FV incentives, there was <b>overwhelming agreement</b> that the program was helpful. But many participants were unaware of incentives programs.	There was <b>overwhelming support</b> to allow SNAP benefits to purchase hot, prepared foods.  Students had <b>unanimous support</b> for having SNAP retailers on their college campuses.	<i>This strategy was not discussed by SNAP participants.</i>	There was <b>general support</b> for this strategy as participants stated either that it would encourage positive choices or that they were neutral because they would not be impacted by this change. Others who opposed the strategy wanted to use SNAP benefits to buy SSBs as a treat. Students were not asked about this strategy.	<b>Most participants opposed</b> a SSB tax with revenue used to address nutrition security and inequities. They felt this approach limited personal choice and felt like a punishment.  Students <b>supported</b> strategies to make shopping with SNAP less stigmatizing, such as more public awareness of SNAP, and to make it easier to enroll in the program.

Author, year	Participants	Benefit increase	Fruit and vegetable (FV) incentive	Retail food environment	SSBs not allowed in SNAP	Combined FV incentive + SSBs not in SNAP	Other
<a href="#">University of Arkansas for Medical Sciences and Arkansas Hunger Relief Alliance, 2021</a>	34 Arkansans who use SNAP and/or individuals who have been food insecure in the last year	Participants were <b>supportive</b> of increased benefit amount and issuance frequency to improve their ability to purchase healthy foods.	Participants were <b>supportive</b> of receiving extra SNAP benefits to purchase fresh fruits and vegetables, but expressed that incentives needed to be easier to use and offered at more places.	<b>Some participants supported</b> using SNAP benefits to purchase hot, prepared foods.	SNAP participants were not asked directly about a standalone restriction, but <b>most participants opposed</b> any restrictions in SNAP, regardless of whether it was paired with a FV incentive or not.	<b>Few participants supported</b> this strategy because of the extra purchasing power for FV, but most felt that the disincentive inhibited their freedom of choice.	<b>Some participants supported</b> a sugary beverage tax with revenue earmarked for SNAP incentives, but others did not believe that this approach would be effective.
<a href="#">Food Insight Group in collaboration with CSPI, 2021</a>	North Carolinian adults who participated in SNAP between March 2019 and July 2020. 27 participants in focus groups (pre-COVID) and 14 participants in interviews (post-COVID)	<b>All interviewees and focus group participants</b> supported benefit increases.	<b>All interviewees</b> supported double-buck style programs. <b>Many focus group participants</b> indicated support for double buck style programs but specified that only incentives with an instantaneous benefit would be helpful.	Regarding online shopping: <b>Very few interviewees</b> supported using SNAP benefits to shop for groceries online. <b>Very few focus group participants</b> also wanted to use SNAP online. Most were not comfortable with other people selecting their groceries.	<b>Few interviewees</b> supported sugary beverage restrictions in SNAP. <b>Focus group participants</b> had both positive and negative feelings about restrictions.	<b>Nearly all interviewees</b> supported increased benefits for healthy behaviors (not purchasing SSBs). <b>Focus group participants</b> had both positive and negative feelings about incentives combined with disincentives.	Other ideas proposed by <b>SNAP participants</b> : Broader dissemination about SNAP programmatic activities; removing cultural barriers to healthy eating; facilitating direct-from-farmer purchases with SNAP dollar; requiring retailer marketing of all new SNAP programs to increase awareness; more immediate discounts at the register; increased SNAP retailer stocking requirements (for more kinds of produce and other items); and allow some hot food purchases.

Author, year	Participants	Benefit increase	Fruit and vegetable (FV) incentive	Retail food environment	SSBs not allowed in SNAP	Combined FV incentive + SSBs not in SNAP	Other
<a href="#">Harkin Institute in collaboration with CSPI, 2021.</a>	37 adult SNAP participants living in Iowa	Increasing benefits was <b>highly supported</b> by SNAP participants. The most common barrier to purchasing healthy foods and healthy eating was cost.	All strategies for SNAP incentives (more benefits for produce, matching dollar for dollar incentives, and more benefits for other healthy items) were <b>supported</b> by SNAP participants.	Strategy: In-Store Signs and Labels This was <b>not supported</b> as they already have a plan for shopping when entering stores. Strategy: 2-for-1 Specials The reactions were <b>largely positive</b> as it would save on money and encourage healthy eating habits. Strategy: Healthy Options in Easy to Reach Locations They had <b>mixed reactions</b> to this strategy. Some felt this strategy could help make healthy purchases, while others thought the display of unhealthy items would overpower the healthy items.	This strategy received <b>very little support</b> with many SNAP participants stating that disallowing SSBs in SNAP is unfair.	This strategy received <b>positive support</b> relative to SSB restriction alone. Some felt that this strategy could help motivate them not to drink SSBs.	SNAP participants were supportive of educational opportunities where they could find healthy recipes and learn the basics of healthy food and meal preparation.

Author, year	Participants	Benefit increase	Fruit and vegetable (FV) incentive	Retail food environment	SSBs not allowed in SNAP	Combined FV incentive + SSBs not in SNAP	Other
<a href="#">Harvard Catalyst in collaboration with CSPI, 2020</a>	43 adult SNAP participants living in Massachusetts	SNAP participants described how the <b>benefits are not enough</b> to feed them and their families and make it challenging to eat healthy. Some reported that benefits could change unexpectedly and quickly and expressed frustration that they do not adjust with inflation and corresponding increases in cost of living.	SNAP participants reported <b>overwhelming support for receiving increased funds towards healthy items</b> . There was broad support for the idea of introducing more food items beyond fresh fruits and vegetables for eligibility for HIP or other incentives programs, including for whole grain bread, milk, and frozen and canned fruits and vegetables.	<b>Pricing strategies</b> (such as sales on healthy items) <b>were the most appealing type of marketing strategy</b> , but only if the items were already included in their shopping plan. The participants also thought that healthy items often feel hidden, so a prominent display would be helpful. Many expressed interest in the opportunity to sample healthy items in stores	SNAP participants expressed <b>great concerns and a lack of support for using disincentive strategies</b> , like removing SSBs from eligible SNAP items, to promote healthy eating and drinking. Recipients would work around the rule and use cash to buy SSBs instead of using SNAP benefits, noting that SNAP often does not cover all of their grocery expenses for the month anyway.	Similar to sentiments about SSB restriction alone, SNAP participants were <b>not supportive</b> , citing discrimination and lack of impact, regardless of receipt of incentives.	There was broad support for increasing access to nutrition education programs and activities in community and retail settings.

## Surveys that assess support for SNAP strategies by SNAP participants and the general public

Some states also conducted polling with SNAP participants to assess level of support for various strategies to improve food and nutrition security. The table below summarizes polling results.

Author, Year	Participants	Fruit and Vegetable Incentive	Retail Food Environment	Sugar-Sweetened Beverage (SSB) Purchases in SNAP	Combined: F&V Incentive + SSBs not in SNAP	Other
<a href="#">Harkin Institute in collaboration with CSPI, 2021</a>	100 adults living in Iowa	<b>75%</b> of adults overall and <b>81%</b> of SNAP participants believe providing more SNAP dollars for fruits and vegetables in grocery stores would be <b>helpful or very helpful</b> for supporting healthy eating in SNAP	<b>68%</b> of both adults overall and SNAP participants believe that ensuring grocery stores, including convenience stores, have a wide variety of healthy foods would be <b>helpful or very helpful</b> for supporting healthy eating in SNAP	<b>56%</b> of adults overall and <b>32%</b> of SNAP participants believe soda/soft drinks should be removed from the list of products eligible for purchase with SNAP	<b>69%</b> of adults overall and <b>64%</b> of SNAP participants believe that providing extra money for fruits and vegetables while not purchasing SSBs would be <b>helpful or very helpful</b> for supporting healthy eating in SNAP	<b>60%</b> of adults overall and <b>57%</b> of SNAP participants believe that providing information on healthier eating through nutrition or cooking classes would be <b>helpful or very helpful</b> for supporting healthy eating in SNAP
<a href="#">Harvard Catalyst in collaboration with CSPI, 2020</a>	248 SNAP participants (% of participants that said each strategy would be helpful or very helpful to support healthy eating)	<b>83%</b> of participants support having more money to buy fresh fruits and vegetables in grocery stores	<b>77%</b> Support ensuring grocery stores, including convenience and corner stores, have a wide variety of affordable, healthy foods-such as F&Vs, lean meats, low-fat milk, and whole grains  <b>67% support</b> ensuring grocery stores offer more healthy food options in place of unhealthy options in main areas like checkout, end-of-aisle shelves, at store entrances, and placed on shelves at eye level	<b>46%</b> Support removing sugary drinks from the products that can be purchased using SNAP benefits	<b>64%</b> Support removing sugary drinks from the products people can purchase with SNAP benefits and in return get more money to be used to purchase fruits, vegetables, or other healthy foods	<b>67%</b> Support giving information to SNAP recipients about healthier eating through nutrition or cooking classes

For more information, please contact the Center for Science in the Public Interest at [policy@cspinet.org](mailto:policy@cspinet.org).

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