

SNAP Access and Utilization

Background

SNAP provides benefits via an electronic benefit transfer (EBT) card, which participants can use to buy groceries at more than 250,000 participating retailers across the country.¹ Research shows there are numerous positive health impacts of SNAP, including reduced food insecurity, reduced health care expenditures, improved self-reported health, and lower risk of chronic health conditions later in life.²

As an entitlement program, SNAP is designed to serve everyone that applies and meets income and asset eligibility criteria.³ Yet the criteria exclude many people experiencing food insecurity. Some barriers to accessing SNAP may particularly impact people of color. For example, incarceration, especially for drug crimes, is biased disproportionately against Black and Latina/o people in the U.S., so barriers to accessing SNAP among people with drug felony convictions have particularly inequitable impacts.⁴ As such, policies to help more people in need access the program may improve public health and reduce health inequities.

The table below outlines some of the major SNAP eligibility restrictions.^a

Table 1. SNAP eligibility restrictions

Impacted group	Description	Impact	Federal Opportunities	State/Tribal/Territory Opportunities
College students 7 U.S.C. § 2015(e).	In general, students enrolled in college more than half-time are not eligible for SNAP, unless they meet the normal eligibility requirements and an exemption. Exemptions include, but	Currently, few states and post-secondary institutions collect data on food insecurity and SNAP participation specifically in students. National data show that more students from low-income	The Consolidated Appropriations Act, 2021 expanded college student eligibility until a month after the national public health emergency is lifted.	States can encourage campuses to implement “hunger-free” designations. This could include designating a SNAP outreach coordinator on campus to help students enroll;

^a Last updated January 2022. Note: this table is not meant to be an exhaustive summary of all research and opportunities.

	<p>are not limited to, having a disability, working at least 20 hours per week, and caring for a child under age 6.⁵</p>	<p>households are attending college in recent decades.⁶ Before COVID-19, college students already experienced greater food insecurity than average households.⁷ A national survey of 86,000 college students in 2019 found that 45% of respondents experienced food insecurity in the prior 30 days.⁸ A 2016 GAO analysis found that only 26% of students from low-income households with food insecurity risk factors were receiving SNAP.⁶ The pandemic further exacerbated student hunger, especially among students with nonwhite racial and/or ethnic identities.⁹ Low participation rates could in part be attributed to FNS not clearly communicating the confusing college student eligibility rules.⁶</p>	<p>Several bills have been introduced in Congress. For example, the Enhance Access to SNAP (EATS) Act would expand student access by treating college attendance as work for the purposes of determining SNAP eligibility. The Closing the College Hunger Gap Act would require the Department of Education to collect data on food insecurity of college students and student eligibility under SNAP.</p> <p>holding SNAP awareness and pre-screening events to determine eligibility; and collecting and reporting on student food insecurity.</p> <p>States can also use SNAP flexibilities to expand student eligibility, such as by expanding courses for SNAP-qualifying training programs.¹⁰ For example, Massachusetts allows SNAP eligibility for students of certain federally-funded community colleges.^{11, 12}</p>
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<p>People with drug-felony convictions and other disqualifications</p> <p><i>21 U.S.C. § 862a</i></p> <p><i>7 U.S.C. § 2015(i), (m), (n), (r).</i></p>	<p>Individuals with drug felony convictions are permanently disqualified from SNAP, unless states opt out of or modify the ban, such as by imposing temporary bans or requiring periodic drug testing.</p> <p>And SNAP also allows states to impose disqualifications based on other actions, including cooperation with child support and lack of compliance with work requirements in another benefit program.</p>	<p>The drug felony ban removes crucial assistance for people particularly likely to experience food insecurity, may contribute to higher rates of recidivism, and has inequitable impacts across racial/ethnic groups. People who were formerly incarcerated are twice as likely to experience food insecurity, compared to the rest of the population.¹³ Denying food assistance contributes to conditions that make it difficult to re-enter into society, and up to 50% of people with prior federal drug trafficking offenses are rearrested.¹⁴ Incarceration, especially for drug crimes, is biased against Black and Latino people at all stages in the U.S. criminal justice system.⁴ Black people are imprisoned over five times the rate of White people, and Latino</p>	<p>President Biden's proposed American Families Plan would eliminate the SNAP drug felony ban, but this provision was not included in the Build Back Better legislation ultimately taken up by Congress.</p> <p>The introduced Making Essentials Available and Lawful (MEAL) Act would repeal the drug felony ban.</p>	<p>States can waive the SNAP drug felony ban. As of August 2021, South Carolina is the only state with the full drug felony ban still in place, 21 states have a modified ban, and 28 states and Washington, DC have no ban.¹⁷ See the status of your state here: CLASP. No More Double Punishments</p> <p>States can also choose not to impose additional restrictions—such as those related to child support or comparable disqualifications—and can rescind policies that may already be in place.</p>
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		<p>people are imprisoned over twice the rate.¹⁵ SNAP disqualifications also put the rest of the household at greater risk of food insecurity and have not been shown to increase compliance with other programs.¹⁶</p>		
<p>Immigrants 7 U.S.C. § 2015(f). 8 U.S.C. § 1613. <i>Inadmissibility on Public Charge Grounds</i>, 84 Fed. Reg. 41292, 41501 (Aug. 14, 2019) (relevant sections codified at 8 C.F.R. §§ 212.21 - .22).</p>	<p>In general, SNAP is not available for people living in the U.S. who are not citizens. Even legal permanent residents 18 and over cannot receive SNAP until they have been in the U.S. in a “qualified” immigrant status for five years. DACA recipients and people without documentation are ineligible.</p> <p>In addition, under existing immigration law, individuals can be denied entry or a green card if deemed likely to become a “public charge”. In 2019, the Department of</p>	<p>Undocumented immigrants may be twice as likely to experience food insecurity, compared to the overall population.^{18, 19}</p> <p>The public charge rule caused many families to forgo nutrition assistance and other public benefits out of fear and confusion (often called the “chilling effect”). In 2019, one in five immigrant families reported avoiding SNAP or other public benefits out of fear of impacting their green card status.²⁰</p>	<p>In early 2021, the Department of Homeland Security reversed the broadened definition of public charge, and they are now considering revisions to the rule.</p> <p>The introduced LIFT the Bar Act would restore access to public programs, including SNAP, for lawfully present immigrants by removing the five-year waiting period and other access restrictions.</p>	<p>States can use their own funds to extend food assistance benefits to those currently ineligible for SNAP. For example, California funds many authorized immigrants who do not qualify for SNAP, and legislation has been introduced to extend state-funded SNAP to all income-eligible Californians, regardless of immigration status.²¹ Connecticut, Illinois, Maine, Minnesota, and Washington also provide nutrition assistance to some immigrants that are not eligible through federal funds.²²</p>

	<p>Homeland Security (DHS) promulgated a rule that dramatically expanded the public charge definition to individuals who are determined “more likely than not” to receive even modest assistance from a broad set of benefits—including SNAP—at any point over their lifetime.</p>			<p>State agencies can also work with trusted community partners to conduct outreach to eligible immigrant populations to help alleviate fear of government retribution for using SNAP.</p>
<p>People at high risk of food insecurity living just above the poverty line and/or with modest assets.</p> <p><i>7 U.S.C. § 2014(c), (d).</i></p> <p><i>Food and Nutrition Act of 2008. P.L. 88-525, 78 Stat. 703.</i></p>	<p>Federal income and asset standards exclude many households at risk of food insecurity. For example, somebody with a gross annual income of \$17,000 and/or with \$2,510 in savings in 2021 would not be eligible for SNAP in 2021. However, many people with incomes below 185% of the federal poverty line still experience food insecurity.²³</p> <p>States can implement “broad-based categorical eligibility” (BBCE) to relax</p>	<p>Eliminating or adopting less restrictive asset tests help people avoid debt and save for emergencies. This is especially important for people of color, who have long borne the brunt of racist policies that make it harder to buy homes and accumulate other assets.²⁶ Raising asset limits also streamlines SNAP recertification and reduces SNAP “churn”, cycling on and off SNAP while still eligible.”²⁷</p>	<p>Several bills have been introduced in Congress. For example, the <u>Allowing Steady Savings by Eliminating Tests, (ASSET) Act</u> would eliminate the use of asset tests that restrict eligibility for SNAP and several other public benefit programs. The <u>Children's Savings Accounts Offer Parents Plenty Of Reasons To Understand and Invest in Tuition Yearly Act or the CSA OPPORTUNITY Act</u> would exclude the value of certain children’s savings accounts when</p>	<p>States can raise SNAP income limits up to 200% of the federal poverty level and remove or raise asset limits. For example, in 2021 Nebraska increased SNAP’s gross income limit from 130% to 165% of the poverty line, opening up eligibility for over 3,500 Nebraska households.³⁰</p> <p>States can also consider what to count as income for the purposes of determining SNAP eligibility.</p>

	<p>these limits. BBCE allows states to offer benefits funded by Temporary Assistance for Needy Families (TANF) to SNAP applicants to lift income and/or asset tests.^{24, 25}</p>	<p>Raising income cutoffs can help to eliminate a “cliff effect”, in which a small earnings increase may trigger a much larger loss in SNAP benefits, leaving a family worse off if they accept the raise.²⁸</p> <p>Finally, as BBCE expands SNAP eligibility, more children also become eligible for free or reduced-price school meals.²⁹</p>	<p>determining eligibility for SNAP and other public benefits.</p>	
Military families 37 U.S.C. § 101(25).	<p>For purposes of determining eligibility for SNAP, a servicemember’s Basic Allowance for Housing (BAH) is counted as income. BAH is a non-taxable part of a servicemember’s pay, designed as housing compensation, but it often presents an artificial barrier to qualifying, or receiving adequate benefits for, SNAP.</p>	<p>There is a lack of formal data, but evidence suggests many military families are experiencing food insecurity but not accessing SNAP.</p> <p>In a 2020 Blue Star Families survey, 14% of enlisted active-duty families reported low or very low food security in the previous year.³¹ A 2019 Department of Defense (DOD) report</p>	<p>The Equal Access to the Right Nutrition for Military Families (EARN) Act would require DOD to notify and enroll qualifying military families in SNAP and establish a temporary SNAP benefit for those leaving service.</p> <p>USDA can exclude the BAH from counting as income for the purposes of determining SNAP,</p>	<p>While the BAH barrier must be addressed at the federal level, state SNAP agencies can conduct outreach about military family and veteran eligibility, including by establishing community partnerships for SNAP enrollment. Policies to raise income limits would likely also help more military families to qualify for SNAP.</p>

		<p>estimates that less than 0.5% of the roughly 1 million service members stationed in the U.S. are using SNAP at a given time.³² Yet we know that today's military includes many people supporting families, and one in three children at schools on military bases may be eligible for free or reduced-price lunches.³³⁻³⁵</p>	<p>WIC, and school meal eligibility. USDA can also work with other agencies to share data and strategies for reducing food insecurity among military families.</p>	
<p>People subject to the three-month time limit 7 U.S.C. § 2015(o).</p>	<p>Benefits are cut off after three months—in each three-year period—for many adults ages 18 to 49 (“able-bodied adults without dependents” (ABAWDs)), unless they work at least 20 hours per week or can document inability to work. States may obtain waivers for areas with high unemployment.³⁶</p> <p>The definitions for “able-bodied” and “dependents” are quite narrow. SNAP defines a</p>	<p>The time limit reduces SNAP participation, has not been found to increase employment, and disproportionately impacts non-Hispanic Black and Hispanic adults.³⁷⁻³⁹</p> <p>The narrow definitions of “able-bodied” and “dependents” exclude people from time limit exemptions who are living with disabilities but do not receive federal disability benefits and people with non-</p>	<p>The Families First Coronavirus Response Act temporarily halted the time limit until a month after the national public health emergency is lifted. The Improving Access to Nutrition Act has been introduced several times in the House to repeal the three-month time limit, but has yet to be enacted.</p>	<p>States may temporarily waive this policy in areas of high unemployment or insufficient jobs.⁴⁰ Some state legislatures have prohibited time limit waivers. Until the time limit is permanently ended at the federal level, rescinding state laws that prohibit these waivers and/or passing state laws to require these waivers would help to expand access to SNAP.</p>

	person as disabled if an individual receives federal benefits for the disability and defines dependents as individuals under 18 living in the same household.	traditional family structures who support children who do not live with them.		
People living in some U.S. territories 7 U.S.C. § 2012(r). 7 U.S.C. § 2028.	SNAP currently operates in all U.S. States, the District of Columbia, Guam, the Virgin Islands, and some Indigenous reservations. Residents from low-income households in American Samoa, the Northern Mariana Islands, and Puerto Rico are not eligible for SNAP, and may instead receive food assistance from the Nutrition Assistance Program (NAP). While SNAP is an entitlement program and all who qualify can use it, NAP is a block grant with a fixed amount of Congressionally authorized funds.	While SNAP is able to expand when more people are experiencing hardship and contracts as the economy recovers, NAP's funding is capped, so it cannot consistently provide benefits to eligible people. ⁴¹ A 2010 USDA study found that roughly 220,000 more Puerto Ricans would participate in nutrition assistance if Puerto Rico transitioned from NAP to SNAP. ⁴²	The Territorial Equity Act and many other bills have been introduced in Congress over the years to transition these U.S. territories to SNAP or to increase NAP benefit adequacy. A Congressionally mandated feasibility study is also currently underway to examine transitioning these territories to SNAP.	The U.S. territories can establish eligibility and benefit levels for NAP in their territory but must ensure spending stays within the block grant fixed funding levels. For example, in response to additional NAP funding after hurricanes Irma and Maria, Puerto Rico raised income limits. ⁴¹

<p>People living in Tribal areas 7 U.S.C. § 2013(b). 7 U.S.C. § 2013(b)(2)(C).</p>	<p>Tribal governments face federal statutory barriers to directly administering SNAP and accessing program funds, such as SNAP-Ed.</p> <p>Additionally, the Food Distribution Program on Indian Reservations (FDPIR) is the only commodity food program that cannot be used at the same time as SNAP benefits. FDPIR provides food packages to people with low incomes living on Indigenous reservations where there may not be easy access to SNAP enrollment offices and stores that accept EBT. Qualifying Tribal members can switch between SNAP and FDPIR from month-to-month. However, these changes require the Tribal member to give notice of, and administrators to register, the change.</p>	<p>In a recent survey of American Indian or Alaska Native people living in Tribal communities, half of respondents experienced food insecurity during COVID-19, and SNAP participation increased from 14% pre-COVID to 20%.⁴³ Towards the end of 2020, more families chose SNAP instead of FDPIR, which may in part be due to federal legislation that boosted benefits and made it easier to access the program (i.e. through remote services).⁴³</p> <p>Extending remote services and allowing concurrent participation would simplify the benefits process for recipients and administrators. And simultaneous participation would be more likely to address food insecurity needs in Tribal communities than either program alone.⁴⁴</p>	<p>The SNAP Tribal Food Sovereignty Act of 2021 was introduced to enhance Tribal food sovereignty by giving tribal governments the option of entering self-governance contracts with USDA to allow for a more active role in SNAP administration, including decisions related to eligibility criteria.</p> <p>Congress could also allow simultaneous participation in FDPIR and SNAP, allow Tribes to directly access SNAP-Ed funds, and extend remote application opportunities (remote operations are touched on further in Table 2).</p>	<p>Tribal governments can apply to states to directly administer SNAP, but there are many barriers to doing so. An essential step is ensuring Tribal leaders have a seat at the table in federal policy decisions that directly impact them.</p>
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Even among people who are eligible for SNAP, it can be hard to access the program, and states vary widely in how they conduct outreach and enrollment. In 2018, 82% of people eligible for SNAP participated in the program. Participation rates vary widely, dropping to as low as 55% in Wyoming.⁴⁵ The table below outlines some of the major barriers and facilitators to utilizing benefits.^b

Table 2. Facilitators to utilizing SNAP benefits

Category	Description	Impact	Federal Opportunities	State/Tribal/Territory Opportunities
Simplified operations 7 U.S.C. § 2020.	State SNAP agencies are responsible for certifying SNAP households, resulting in different application and recertification processes across the country (see detailed overview of state options here: SNAP State Options Report, 14th Edition). Congress allowed states to relax certain procedures to ensure SNAP access during the COVID-19 pandemic (see “Federal Opportunities” column).	Application and recertification requirements—which tend to be more burdensome than programs for the wealthy—contribute to eligible households not applying or recertifying for SNAP. ⁴⁶ Some have deemed this burden a “time tax.” ⁴⁷ In a 2020 survey of state SNAP administrators, respondents agreed that COVID waivers of interview requirements, extended recertification	The Families First Coronavirus Response Act allowed states to temporarily waive various components of SNAP operations to facilitate access to the program, including by extending certification periods and relaxing reporting and interview requirements. The 2020 SNAP administrator survey indicated that states are interested in federal policy that would allow for automatic triggers of the successful COVID-19	States can pursue a range of administrative options to meet the needs of SNAP participants in their state, including by using demonstration authority to test operational changes to simplify SNAP, which can inform state and federal policy.

^b Last updated January 2022. Note: this table is not meant to be an exhaustive summary of all research and opportunities.

		<p>periods, and allowance of telephonic signatures instead of audio recordings helped ensure access to SNAP during the early months of the pandemic. Yet many states also said the recertification waivers created more work later to process recertifications.⁴⁸</p> <p>Simplified operations may help reduce disparities in program utilization, as Black households are - more likely to experience churning—cycling on and off SNAP while still eligible—than White households.⁴⁹</p>	<p>waivers during emergencies.⁴⁸</p> <p>The SNAP Act of 2021 would permanently permit SNAP application through a recorded telephone verbal agreement.</p>	
<p>Streamlined applications</p> <p><i>Add citation 7 U.S.C. § 2020 (e)(2)(B)(ii)(I)</i></p>	<p>Some states have separate applications for SNAP and other public benefits (like Medicaid and TANF) whereas other states streamline these into joint applications.</p>	<p>Streamlined applications may help more participants to access the program, reduce program costs, and alleviate work for agency staff.⁵⁰</p>	<p>The introduced Health, Opportunity, and Personal Empowerment (HOPE) Act would create pilot projects to use technology to apply for multiple public benefits at once.</p>	<p>States can make it easier to utilize SNAP by simplifying the application, including through streamlined enrollment across Medicaid and other public benefit programs.^{50, 51}</p>

				A 2021 report explores opportunities for states to coordinate processes to improve access to affordable, nutritious food, including through streamlined applications: <u>Fighting Hunger by Connecting Cross-Sector Partners and Centering Lived Expertise</u>
Other avenues to facilitate SNAP utilization 7 U.S.C 2016(h)(9)	Additional strategies to facilitate SNAP utilization may include ensuring sufficient outreach and language support, reducing any unnecessary requirements, and ensuring SNAP deductions allow people with high expenses to receive adequate benefit levels.	Policies that add requirements, such as a photo on EBT card, can be expensive and deter participation. ^{52, 53} In FY2015, only 42% of eligible seniors turned to SNAP, compared to 83% of all SNAP-eligible people. ⁵⁴ SNAP deductions—such as the medical deduction for seniors and people with disabilities—can help to ensure participants receive enough benefits to justify enrolling in SNAP. ⁵⁵	Federal law allows states to require that an EBT contain a photograph of one or more members of a household; in states that opt into this requirement, there must be an established procedure to ensure other household members can use the card. The <u>Closing the Meal Gap Act</u> would authorize the standard medical deduction in every state for seniors and people with disabilities and eliminate the cap on the excess shelter deduction.	States that require photos on EBT cards can introduce bills to remove this requirement. States can also ensure SNAP caseworkers help applicants to identify all available deductions.

Resources

- [2021. HER. Strengthening the Public Health Impacts of SNAP: Key Opportunities for the Next Farm Bill](#)
- [2021. HER. SNAP Waivers and Adaptations During COVID-19](#)
- [2020. HER. Strengthening the Public Health Impacts of the Supplemental Nutrition Assistance Program Through Policy](#)
- [US Department of Agriculture Food and Nutrition Service. State Options Report: Supplemental Nutrition Assistance Program](#)

For more information, please contact the Center for Science in the Public Interest at policy@cspinet.org.

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