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August 9, 2021

Deputy Under Secretary Stacy Dean
United States Department of Agriculture
Food and Nutrition Service
130 Braddock Place Ste. 200 Alexandria, VA 22314

Re: EBT Stakeholder Feedback

Dear Deputy Under Secretary Stacy Dean:

As the bipartisan, national membership association representing state and local health and human services agencies, we believe that an integrated approach that considers the alignment of nutrition and other foundational supports is critical to foster well-being for people and communities. As the USDA Food and Nutrition Service considers how to modernize SNAP EBT issuance and expand available payment options for participants through American Rescue Plan Act and Consolidated Appropriations Act funding, we encourage the administration to:

- **Prioritize cross-program alignment** in EBT modernization to remove barriers to accessing and using benefits;
- **Harness technology and analytics** to create efficiencies, build field capacity, and capture key insights; and,
- **Center equity and inclusion** by bringing key stakeholders to the table early on to ensure modernization meets the needs of user groups, importantly including families who participate in programs and retailers that accept SNAP, as well as WIC and TANF, as payment.

Cross-program alignment and interoperability

We encourage FNS to support EBT modernization efforts that promote interoperability and disassemble siloes so that solutions work optimally across health and human services programs that utilize EBT technology for benefit issuance. Investments in EBT technology should be coordinated across FNS programs (i.e. SNAP, WIC, Farmers Market Nutrition Program, P-EBT) and with other agencies that utilize EBT such as TANF. FNS can promote cross-program alignment and interoperability by:

1. Establishing a federal work group to strategically plan and coordinate EBT modernization efforts across programs.
2. Consult people with lived expertise on their experience using EBT technology to ensure FNS' understanding of needs and solutions are centered on people that use SNAP and other EBT-based programs.
3. Embed in pilot projects, RFPs, technical assistance, and other planning efforts for client-facing EBT technologies (e.g. mobile benefits, shopping apps, online purchasing, etc.) resources and incentives for cross-program interoperability and portability in the design and implementation of solutions.

American Public Human Services Association advances the well-being of all people by influencing modern approaches to sound policy, building the capacity of public agencies to enable healthy families and communities, and connecting leaders to accelerate learning and generate practical solutions together.

INFLUENCE. BUILD. CONNECT.

Investments in technology and field capacity

Federal investments to explore mobile payment technologies through pilot projects are an important step towards addressing longstanding shortcomings of EBT technology that the COVID-19 pandemic has further exacerbated —such as mailing delays, card stock shortages, and general challenges in getting people benefits when they need them. As our world continues to shift to demand more virtual programming, these challenges will undoubtedly persist beyond the pandemic. Solutions supported by FNS should be designed to build field capacity by ensuring all stakeholders—state and local administrators, retailers, program participants—can support the effective implementation of new technologies and increase the evidence base of what works.

Building Field Capacity Through Technical Assistance Grants

USDA can help accelerate future-focused technology solutions by ensuring that investments in mobile benefit issuance and redemption technologies include support to state and local agencies—as well as retailers interested in pursuing SNAP online payment—in the form of implementation tools, technical assistance, and key insights to promote effective implementation of new technology. Technical assistance plans should go beyond just addressing how to build new technology solutions and address how staff and participants are best positioned to use new technology, such as through promoting outreach and training materials and expanding the services of EBT assistance lines, for example.

State and local agencies may also benefit from technical assistance on communication strategies for rolling out new technologies, so that their constituents are made aware of changes through clear and consistent messaging. Communication and outreach efforts of this nature can represent significant costs to agencies. FNS can support these efforts by ensuring grant funding accounts for these costs and designating these activities allowable expenses.

In addition, to bolster human-centered design for this important modernization to benefit issuance, pilot agencies will likely benefit from technical support gathering insights from intended users. Agencies should draw on user input not only to test their design after the pilots are fully scoped, but more importantly early on in their scoping process. Early user insight can help ensure states design human-centered pilots and mitigate potential unintended consequences.

Using the Mobile Payments Evaluation Study to Increase Evidence of What Works

As FNS will first invest in five sites to guide prospective wider adoption of mobile EBT solutions, it will be imperative for the work of these sites to be well-documented and for their lessons-learned to be disseminated to the field at large. The insights captured from these investments could have a significant impact on the future of benefit issuance and EBT payment methods for SNAP and other programs. The pilots' impacts on participant access, ease of use, and program integrity should drive broader advancement of mobile technologies.

We encourage FNS to promote analysis of demographic data in evaluations—including race and ethnicity, geographic location, preferred language, and disability status data—so that the pilot's effects on various demographic groups can be assessed. Such evaluations can help states identify whether technology changes impact rural, urban, and suburban groups differently, for example, and can help future implementors to tailor the effectiveness of modernizations so that people who speak various languages and people with varying abilities can equally benefit from modern solutions.

Centering equity and inclusion

EBT modernization can catalyze large strides in reducing barriers to SNAP benefit redemption if carried out through an equity lens and centered on individuals and families. Prioritizing input from eventual users of these technologies can help USDA assess how to best roll out this option without imposing barriers on people who will need to continue using physical cards—because for example they do not have cell phones, their phones are less technologically equipped, they have limited cell service, or they share mobile phones with other household members.

This stakeholder group will also be imperative to assessing the security and ease of use of modernizations, whether they are in the form of Quick Response (QR) codes, Near Field Communication (NFC) technologies, or other mobile payment technologies. Failing to engage end users early on could result in technology changes that result in new barriers or exacerbate existing barriers to benefit access and use that are avoidable.

It will be equally important for this group of stakeholders to be widely informed of changes to benefits issuance practices through effective outreach and education initiatives before and during wider roll out of changes. FNS should consider using existing mechanisms to include participating families in the design of modernization by exploring how SNAP Education programs and Outreach Plans could be leveraged to support these efforts. In addition, new mechanisms may need to be established for effective engagement of all affected stakeholders. Implementing agencies will likely benefit from guidance, funding, and technical assistance on these fronts, as we noted above.

Conclusion

Thank you for your continued efforts to work toward a food system that meets the immediate and long-term needs of children and families. We believe EBT modernization presents an important opportunity to create new solutions that work across programs. We also know that siloed modernization could have unintended, lasting consequences for interoperability. We look forward to working together to support modernized and integrated nutrition supports. Please reach out to Matthew Lyons at mlyons@aphsa.org with any questions or opportunities for further discussion and collaboration.

Sincerely,

Matthew Lyons



Director, Policy and Research
American Public Human Services Association

Belit Burke



Chair, American Association of SNAP Directors
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CC Andrea Gold