

2023 Farm Bill

A Roadmap for Building a More Effective, Resilient, and Customer-Centered SNAP Program

MARCH 2023



Who We Are

APHS A is the bipartisan, national membership association for state and local human services agencies and the subject matter experts that execute their mission to improve outcomes for people nationwide. Our members are experts in administering, overseeing, and aligning programs that build resilience and bolster the well-being of people through access to food, health care, housing, employment, child care, community support, and other key building blocks. Our members also include leaders in performance measurement and data analysis, human services information technology, workforce development and training, and legal dimensions of the field.

APHS A has developed its 2023 Farm Bill recommendations through a member-led process, leaning on the unique expertise of its network of state and local agency executives, SNAP Directors, QC Managers, Chief Information Officers, SNAP Employment & Training leads, SNAP-Ed and Outreach coordinators, and more. The recommendations set forth reflect the bipartisan consensus of public administrators that provide the critical infrastructure needed for SNAP to realize its potential as an essential tool that promotes thriving families and communities.

Our Guiding Principles

In developing our Farm Bill recommendations APHS A is committed to:

- People and public service, building common ground, and partnering across sectors
- Our pursuit of the limitless possibility of human potential
- Evidence and outcomes rather than ideologies
- Tackling and dismantling structural inequities, biases, and harms – and applying a race equity lens in all we do
- Listening to lived experience and using data to identify and address root causes
- Supporting the human services sector in developing a modern workforce that is healthy and well

SNAP Policy Areas of Focus



Improving Customer Experience in Benefits Access



Creating Pathways for Economic Mobility through SNAP E&T and Work Supports



Advancing Equity in SNAP Policy



Strengthening Program Integrity



Improving SNAP Technology and EBT Infrastructure



Enhancing Nutrition Security through SNAP-Ed



Streamlining Administrative Policies and Procedures



Improving Customer Experience in Benefits Access

In the last several years, state and local SNAP agencies have gained a deeper understanding of the critical need for customer-centered experiences in applying for and retaining SNAP benefits. SNAP agencies have made strides in creating more tailored experiences that reduce burden for customers, and in turn, decrease administrative burden. Federal SNAP policy options play a pivotal role in establishing more effective and customer-friendly processes that SNAP agencies can use to build on these lessons learned.

APHSA Farm Bill Recommendations on Customer Experience and Benefits Access

Establish a Customer Experience Demonstration Project that allows states to customize pilots to test and evaluate changes that improve customer service. Temporary flexibilities during the COVID-19 pandemic created a natural experiment for states to test a variety of rule changes in how to process applications that impact how customers access and engage in SNAP. Yet, these changes were made during an unprecedented time of disruption in the program and limited data is available to quantify how these changes impact customer experience and outcomes. Congress should authorize a Customer Experience Demonstration Project to allow a group of states to test a variety of alternative methods to streamline and align how customers experience SNAP applications and recertifications through customized demonstrations in each state. Through an independent national evaluation, findings from the various pilots can be used to inform policymaking in future Farm Bills.

Establish the Standard Medical Deduction, Combined Application Project, and Elderly Simplified Application Project as permanent state options. These demonstration projects have successfully reduced hurdles for people accessing SNAP (especially for participants who are elderly or have a disability),¹ while reducing administrative burden and maintaining program integrity. Despite their success, these policy levers remain only available through demonstration project or statutory waiver authority, placing significant reporting requirements and QC verification requirements that increase barriers to state uptake and, in some cases, limiting the number of states that can participate.² Transitioning these to a permanent state option would both allow more states to participate and would reduce burden for states already participating, thus freeing up additional time to test new innovations.

Expand allowable non-merit staffing flexibility. As state and local SNAP agencies continue to struggle with staff capacity, options to utilize non-merit staff **to support recording or accepting client information and reported changes, conducting interviews, and handling client complaints regarding case eligibility and benefits** would decrease eligibility processing times and support customers in accessing their benefits faster as well as free up time for merit staff to focus on other duties necessary in SNAP such as better engaging with applicants and customers. (See also our recommendation to allow non-merit staff to perform SNAP E&T screening and referral duties in the following section).

Increase the earned income deduction. Many people who receive SNAP are actively working, yet they still require additional support to help afford nutritious and desirable food for themselves and their families. Increasing the percent deduction on earned income would support people who work in moving toward economic mobility and mitigating some of the harms of benefits cliffs.



Protect the state option to use Broad-Based Categorical Eligibility. BBCE has proven incredibly successful across the country to expand access and streamline enrollment in SNAP. Currently, 44 states utilize BBCE in some way,³ and removing or weakening this policy would take away SNAP and related benefits from millions of households and add administrative complexity for both eligibility and QC staff, and costs to the program.⁴

Remove the cap for shelter deduction. The shelter deduction is calculated as housing costs that exceed half of the household's net income and is currently capped at \$624 for households without a household member who is elderly or disabled.⁵ This inequitably serves people across the country living in areas with higher rent and disproportionately hurts families with children who need bigger places to live. In 2020, 23% of U.S. renters reported spending over half of their income on rent.⁶

Raise the resource limit for SNAP. SNAP is a critical support to assist in meeting people's basic needs while they work to acquire the resources that they need for upward mobility. By creating strict asset limits,⁷ SNAP is removing the ability for households to acquire savings that can help them weather future storms and build economic security for themselves and their families – ultimately leading to an increased reliance on SNAP. Raising asset limits to a level that ensures people are transitioning off SNAP at a point of economic stability for their household will better position individuals for long-term success.



Creating Pathways for Economic Mobility through SNAP E&T and Work Supports



By 1987, each state's SNAP program included an employment and training component to strengthen possibilities of career advancement for families receiving assistance. Equipping benefit recipients with the skills and training they need to earn higher wages and support their families is a strong step forward in sustainable government assistance program design. A closer look at SNAP E&T policies offers opportunities to create a more effective, customer-centered program experience, reduce participant churn, and assist participants in avoiding benefit cliffs.

APHSA Farm Bill Recommendations on SNAP E&T and Work Supports

Consistently exclude from SNAP eligibility and benefit determinations earnings generated from work-based learning programs, such as subsidized employment and apprenticeships, for participants in SNAP E&T, WIOA, and other programs that satisfy ABAWD work requirements. SNAP recipients receiving earnings from evidence-based work-based learning programs should not be confronted with the risk of losing their SNAP eligibility in order to participate in subsidized employment, apprenticeship, on-the-job-training, and similar programs that are strongly linked to positive employment outcomes. Congress should address this benefit cliff by disregarding income SNAP participants receive through participation in such programs that satisfy SNAP work requirements as defined in 7 U.S.C. 2015(o)(1).⁸ This income disregard policy should be further extended to SNAP participants enrolled in other government programs providing work-based learning opportunities, such as vocational rehabilitation programs and refugee employment programs.

Permit non-merit staffing to perform SNAP E&T screening and referral duties specified in 7 CFR 273.7(c)(2).⁹ Congress should permit state agency personnel and contracted organizations not involved in the certification process, such as SNAP E&T program specialists and SNAP E&T third-party partners, to determine the appropriateness of, and to make, SNAP E&T referrals.¹⁰ These staff are experts in understanding employment and training needs for SNAP recipients. Requiring state certification personnel to perform these duties adds additional process that complicates service delivery to SNAP E&T participants and demands eligibility workers make decisions on specialized employment and training issues they are not best positioned to lead.

Establish national demonstration pilots to test and evaluate changing ABAWD SNAP time limits from three to six or nine months within a 36-month period among a group of pilot states. Recent analysis suggests the current ABAWD work requirement does not substantially improve employment or earnings while substantially reducing SNAP participation among those subject to the time limit.¹¹ Testing and evaluating alternative ABAWD time limits can provide critical insights needed to inform policy changes that promote better outcomes for SNAP participants. Congress should establish a national demonstration to evaluate how shifting the 3-in-36 countable months ABAWD time limit to six and nine months among a group of volunteer states impacts participation, employment, and earnings among SNAP recipients. Demonstration projects should be open to as many states as wish to participate and should not require a cost offset.



Establish demonstration pilots to test and evaluate simplification of work requirements. Current rules for the general and ABAWD work requirements differ in who they apply to, exemption criteria, and ways to satisfy work requirements. These rules are further complicated by different population-specific eligibility restrictions conditioned on work, such as for college students. Collectively, these misalignments create a convoluted system of work requirements that are unwieldy to administer and unrealistic for participants to adhere to. Congress should allow for states to test innovative approaches to simplify work requirements expected of SNAP recipients and conduct a national evaluation of pilot states to understand the cogency and outcomes of alternative strategies. Demonstration pilots should be designed to ensure states cannot impose more restrictive work requirements than what's permissible under existing law.

Expand the Transitional Benefits Alternative policy option to include SNAP E&T participants. The Transitional Benefits Alternative policy option allows states to provide a transitional SNAP benefit for up to five months to individuals whose participation in TANF and state-funded cash assistance programs are ending.¹² The Transitional Benefits Alternative is an important tool to provide continuity of food benefits for cash assistance recipients that have shifted into successful employment. Congress should extend this flexibility to SNAP E&T participants who successfully transition into employment that puts them over-income for SNAP as a way to improve the ability of participants to obtain and retain employment.

Increase SNAP E&T grant (i.e. 100 percent) funds that help states and their employment and training partners launch and scale effective SNAP E&T services. The SNAP E&T administrative funding model, which relies primarily on a 50% reimbursement approach, has significant barriers to entry for trusted community partners (and especially for rural partners) that serve their communities with employment and training programs. SNAP E&T 100% funds that do not require reimbursement are critical to seed and scale employment and training programs for SNAP participants and make sure they are adequately staffed. Yet, over the past several Farm Bills, federal allocations of 100% funds have marginally increased,¹³ and considering inflation, have decreased in value. With a strong economy and high demand for workers, Congress should invest in additional SNAP E&T 100% funds to increase the number of providers, services, and participants served through the program. As part of this funding increase, Congress should also permit states to make SNAP E&T allowable participant reimbursements and supportive services available through their community partners as allowable costs for 100% funds.

Extend eligibility for job retention services from 90 to 180 days. The 2008 SNAP E&T Final Rule allows states to use 100% and reimburseable SNAP E&T funds to provide job retention services for up to 90 days. Yet, many individuals may need additional time with transitional services, such as job coaching, dependent care, transportation assistance, and case management, to improve their long-term employment outcomes. Because job retention is central to the underlying goal of both SNAP and SNAP E&T to help families move out of poverty, Congress should extend job retention service eligibility from 90 to 180 days.

Extend FNS' reallocation spending authority to three years. After the end of each federal fiscal year, any unused state SNAP E&T grant funds are collected by FNS and redistributed to states based on a predetermined formula.¹⁴ This collection and redistribution process typically is not completed until the spring or summer of the following fiscal year. Because FNS only has two years of spending authority for appropriated E&T dollars, states receiving reallocated dollars typically have only a few months to spend these reallocated dollars ahead of the end of the next fiscal year. States could make better and more strategic use of reallocated SNAP E&T funds if Congress extended the authority for these funds for an additional fiscal year. As part of this revision, Congress should also reexamine the formula for prioritization of reallocated funding.



“Deem up” SNAP recipients that meet the maximum allowable hours in work activities allowed by FLSA to satisfy their ABAWD work requirement. Fair Labor Standards Act (FLSA) requirements preclude states from asking individuals in a SNAP E&T program to work more than the number of hours equal to their benefit divided by the minimum wage; yet, for individuals participating in a work experience component, this number of hours may not be sufficient to meet the ABAWD work requirement. SNAP participants enrolled in workfare have separate rules to ensure work hours do not exceed the value of their benefits¹⁵ and TANF regulations allow individuals in such cases to be “deemed up” to satisfy work requirements when they complete the maximum hours allowable.¹⁶ Congress should apply the standard used in TANF similarly so that SNAP E&T participants that are enrolled in a work experience component for the maximum hours allowed by law are considered to have satisfied the ABAWD work requirement.

Provide a guaranteed pledge grant amount to participating states and increase the total amount of funding.

Currently, states pledging to offer E&T services to ABAWDs at risk of losing SNAP eligibility due to time limits may become a “pledge” state, thus qualifying for a share of a \$20 million set aside of SNAP E&T 100% administrative funding that is distributed based on the proportional size of the ABAWD population for each qualifying pledge state. However, this funding covers a very small portion of the actual costs of pledging to serve all at risk ABAWD participants and when states request to be a pledge state, they do not know what their allocation amount will be, since funding is contingent on which states ultimately become pledge states. Congress should adjust the pledge state allocation methodology to provide a more substantial, guaranteed amount of funding to help states make informed plans for how they will add capacity to provide employment and training services for individuals subject to time limits.



Advancing Equity in SNAP Policy

In response to the COVID-19 pandemic, in large part to investments and adaptations in the SNAP program made by Congress, food insecurity on average remained steady or declined. However, food insecurity sharply increased for Black, Hispanic, and Native American households, and there continue to be large gaps in food security across race, ethnicity, and household composition.¹⁷ To eliminate disparities in food security, we must be intentional and explicit in revisiting policies that contribute to inequitable outcomes. The following recommendations reflect recommended policy changes to address systemic and structural inequities within SNAP.

APHSA Farm Bill Recommendations on Advancing Equity

Make permanent the temporary changes in SNAP eligibility for college students. Specifically, provide an additional exemption from the student restrictions to students enrolled more than half-time in an institution of higher education if they are eligible for work study or have an expected family contribution of zero. In a time when 37% of college students are over age 25, and 46% are first-generation students, it is more important than ever to be supporting students as they work to increase their education and career opportunities.¹⁸

Establish a demonstration project that would allow states to exclude income from publicly-funded Guaranteed Income pilots from participants' SNAP eligibility. Under current law, state agencies may exclude money from privately-funded Guaranteed Income projects as counting toward SNAP eligibility *if their TANF or Medicaid program excludes it*, but cannot exclude regular payments from a government source.¹⁹ This creates inconsistency in policy across federal programs for how to treat this type of pilot, causing confusion both for human services agencies and clients.

Eliminate the state option to disqualify people from SNAP who have a drug-related felony. This option disproportionately harms people of color from accessing SNAP benefits and increases the chances of recidivism.²⁰ Many states use modified bans such as requiring the completion of a drug treatment program, yet research shows that nearly 1 out of 5 people seeking treatment are unable to access it.²¹ Additionally, hunger is a leading cause related to why people struggle to meet parole requirements.²² At minimum, Congress should remove the option for a lifetime ban of individuals with drug-related felonies for possession and possession or use, and for any felony specifically related to marijuana.

Eliminate the state option to disqualify people from SNAP who fail to meet child support cooperation requirements. Currently states have the option to disqualify custodial or noncustodial parents for failure to cooperate with the state Child Support Agency, including the failure to establish paternity of the child.²³ While child support is an important program that benefits many of the same households that use SNAP, cooperation with the program (for either custodial or non-custodial parents) should not affect one's ability to qualify for SNAP and purchase food to feed their family.

Eliminate the state option to require a photo on EBT cards. Multiple state legislatures require their SNAP program to utilize the option of photo EBT. However, photo EBT is contrary to destigmatizing SNAP, while concurrently adding additional costs to program administration. Additionally, the policy has not proven to be cost effective nor shown to improve program integrity.²⁴

Create the option for Puerto Rico, the Commonwealth of the Northern Mariana Islands, and American Samoa to transition from NAP to SNAP. Territories that would like to transition to SNAP should be both permitted and supported in making this transition by the federal government.



Strengthening Program Integrity

Quality Control (QC) plays an essential role in ensuring program integrity in SNAP and supporting households in receiving the correct benefit amounts for their circumstances. However, as SNAP eligibility has been offered a variety of flexibilities to test over time through state options, SNAP QC has not permitted adjustments in the same ways, which has created dissonance within SNAP and when comparing programs across the country. The following recommendations provide ways that QC can be supported to both recover from the challenges that have been faced in recent years and strengthen program integrity in the long term.

APHSA Farm Bill Recommendations on Program Integrity

Exclude state error rates for federal fiscal years 2022 and 2023 from counting toward liability. Since March 2020, states have been required to constantly pivot and quickly adapt to changing federal policy options and guidance. States have also responded in varying ways that best suit the needs of their agency at the time. This, in combination with decreased staffing capacity and the impending effects of Medicaid unwinding on caseload volume for recertifications, has not allowed states the adequate time to transition back to consistent and uniform operating procedures. Instead of punishing states with fees, Congress should instead focus on support that can be provided to help states trend back to error rates that were seen prior to the pandemic.

Direct the USDA to create a Technical Assistance Center for Quality Control. This center should be separate from the QC policy, evaluation, and audit staff and should focus on working with state and local agencies on diagnosis of root cause analysis and statistical trends in errors. The Center should provide a broad set of resources and capacity building support to states that operates separately from FNS staff that provide oversight and assign error rates. In addition to supporting states in improving their payment error rates and strengthening program integrity, lessons learned from the Center should be part of a feedback loop back to FNS policy staff to inform potential changes to the 310 Handbook.

Direct the Secretary of the USDA to convene a committee to develop common success metrics to understand the impact of SNAP on social and economic mobility, well-being, and customer experience for participants. The committee should include representatives from other federal agencies, including ACF, CMS and DOL, state and local agency leaders that administer SNAP and connected benefit programs, customers, and other national and community partners. The committee should develop recommendations for common success measures and identify opportunities to align success metrics with other programs that commonly serve SNAP participants.

Require that changes to the annual update to the 310 Handbook go through a public comment period before going into effect. The FNS 310 Handbook is re-released each year with changes varying from minor to significant. However, states are often given little notice or explanation for the changes, and thus left without the opportunity to provide feedback on unintended implications that the changes may create. Congress should require FNS put changes in the 310 Handbook through a public comment process to allow for feedback from states and external stakeholders.



Permit states to align QC verification rules with selected policy options. SNAP QC should not stem from manufactured differences between how states verify applicant information within program eligibility rules and QC rules. For example, some states permit self-attestation for shelter costs, but QC must verify it fully, which can be extremely difficult and time-consuming for QC reviewers. These types of QC errors distract from the substantive errors within agency reviews and participant documentation that should be the emphasis of the Quality Control process. States should be permitted to align QC verification rules with both policy waivers and permanent state policy options that have been established by Congress as acceptable approaches to simplify the eligibility review process.

Separate payment error rates by client errors and agency errors and base the state's eligibility for liability on only the agency error rate. Even though error rates are calculated separately for state and client errors, they both contribute to the overall payment error rate and the liability that a state may be placed in if the error is proportionately high. In cases where the error is clearly categorized as a client error, states should still be accountable for improving communications, but should not be held financially responsible. At minimum, states should only be held to a payment error rate and liability for the client-caused error rate if it is above a threshold of the national average for client errors.





Improving SNAP Technology and EBT Infrastructure

SNAP has witnessed several technological advancements in how its program is administered and delivered since the last Farm Bill. Nearly all states now offer online or mobile applications, and many continue to conduct interviews entirely over the phone. Almost every state now offers online purchasing as a method to use SNAP benefits, and FNS is actively working on the Mobile EBT pilot. Technology has also led to increased security in SNAP, such as the ongoing roll out of the National Accuracy Clearinghouse (NAC). As we look toward the next five years, we must continue advancing SNAP technology to strengthen program integrity and decrease administrative burden.

APHSA Farm Bill Recommendations on Technology and EBT Infrastructure

Expand the opportunity to participate in the Mobile EBT pilot to all states that are interested. In the 2018 Farm Bill, Congress authorized up to 5 states to participate in a pilot project to test mobile payments for SNAP. Despite significant interest from state SNAP agencies and the rapid adoption of mobile payment solutions in the broader retail market, the Request for Volunteers was not launched until July 2022, with states anticipated to be selected imminently. As shown with the rapid uptake of online purchasing at the onset of the COVID-19 pandemic, when states and the federal government moves with purpose, we can rapidly adapt to modernize SNAP technology. Congress should authorize additional cohorts of state mobile EBT pilot projects to continually phase-in implementation among interested states beyond the initial five selected states. Additionally, the work to expand Mobile EBT for SNAP should emphasize alignment with future mobile WIC options.

Permit telephonic signatures to be recorded in writing. Since 2020, state SNAP agencies have had the option to utilize a flexibility to collect signatures over the phone by writing down the verbal assent in their case notes. Without this flexibility, case workers would be required to have special equipment to record the signature over the phone and store it in a case file, which can be extremely costly. By allowing this to be a permanent option, it would increase access to virtual application and approvals of benefits.

Provide permanent federal funding to replace SNAP benefits that have been stolen via identity theft or other methods of third-party fraud including card skimming and cloning. Additionally, based on the reporting required in the Continued Appropriations Act of 2023,²⁵ support state SNAP agencies in transitioning to SNAP payment methods and security measures that are in line with industry standards. The bill additionally authorized federal funds to be used to replace stolen SNAP benefits through September 2024, but Congress should authorize these funds permanently.

Direct the Secretary of the USDA to assess the feasibility of covering online delivery fees for SNAP online purchasing. Free delivery fees for SNAP online purchases would support customers in being able to utilize online purchasing. However, there remain several questions as to how this would work for the many stakeholders at play including FNS, retailers, state and local agencies, and the customers themselves. Dedicated research that focuses on the technology solutions, considerations in policy design for certain eligibility requirements and limitations, and alignment across other benefits (such as WIC and TANF) and payment methods would support the field in understanding the current feasibility of this potential option.



Direct the USDA to establish and maintain a national third-party income verification database that makes the most up-to-date earned income data available to states. States across the country have varying levels of use of tools to verify income. To ensure greater consistency in comparisons across states, including for national error rates, FNS should be funded to bear responsibility for making quality and timely data available to states. Additionally, these tools made available to states should continue to be revisited and expanded as necessary to be responsive to need (for example, leveraging tools to help best track income from the gig economy or assets). Any tools made available through SNAP should also be aligned with income verification tools across other programs such as Medicaid to support streamlined application processing and decrease administrative burden for customers across programs.





Enhancing Nutrition Security through SNAP-Ed

SNAP benefits are the federal government's largest response to food insecurity, and the SNAP Nutrition Education program can also support households in reaching nutrition security – meaning that they can not only afford food, but afford food that is healthy and desirable. SNAP-Ed is an evidence-based program that has existed for over 30 years, and takes a multifaceted approach to improving the health and well-being of communities by providing direct nutrition education and partnering with community organizations, businesses, and public programs to implement policy, systems, and environmental (PSE) changes. The following recommendations focus on unlocking the potential for SNAP-Ed to create a more equitable and sustainable impact in nutrition security across the country.

APHS A Farm Bill Recommendations on SNAP Nutrition Education

Increase investment in the staffing and resources for SNAP-Ed. Increased investment in SNAP-Ed appropriations will support programs to staff up their teams and spend more time dedicated to program planning and evaluation with their implementing agencies. Additionally, this would support both the National and Regional offices in providing more dedicated technical assistance and resources to connect across agencies.

Authorize a demonstration project to better evaluate virtual and Policy, Systems, and Environmental programming. By dedicating resources for evaluation, including specifically for culturally relevant evaluators, the field will be able to better understand best practices for measuring and achieving health outcomes for the growing number of SNAP-Ed activities that focus on virtual services and policy, systems, and environmental interventions.

Invest in an evaluation to understand current overlap and opportunities for alignment across federal nutrition education programs and nutrition incentives. Currently there are multiple nutrition education programs authorized by the USDA, but they are operated by different agencies and offices under differing eligibility requirements and standards. A dedicated evaluation could uplift potential opportunities for better alignment across programs such as SNAP-Ed, WIC, and EFNEP to both decrease administrative burden for states and customers, as well as contribute to better health outcomes in the long term.





Streamlining Administrative Policies and Procedures

In addition to some of the big picture policies that have been discussed in prior sections, it is also essential to think about the smaller policies and procedures that have been codified in SNAP and have shown to no longer contribute to an effective or efficient program. This includes policies and procedures that take a significant amount of time for planning and administration, but rarely result in significant changes in eligibility or benefit amounts.

APHSA Farm Bill Recommendations on Administrative Policies and Procedures

Authorize a demonstration pilot to test and evaluate alternatives to the name, address, and signature minimum application requirement for SNAP. Current statute requires that any SNAP application with at least a name, address, and signature at minimum be processed.²⁶ With the large increases in applications being submitted online, this minimal requirement has become a greater concern as it often results in wasted administrative time if the applicant does not respond to follow up. This demonstration pilot should fund a group of states to test variations to the current requirement and should include an independent evaluation to assess the impacts of the changes on access, equity, and administrative efficiency to inform the larger group of state agencies.

Eliminate the requirement for state agencies to verify applicant employment data through the National Directory of New Hires (NDNH) for SNAP eligibility. SNAP agencies are currently required to use the NDNH to verify employment data for any work registrant, however this data can be up to 7 months old and is largely over 3 months old. In multiple states, NDNH matches result in less than 0.01% of households receiving a change in benefits or eligibility. Yet, individual states are spending upwards of \$1 million to pay for the necessary contracts and staff time dedicated to this match process.

Fund SNAP as a true appropriation by authorizing “such sums as necessary” in the fourth quarter of the fiscal year and a first quarter advance. SNAP is yet to be funded as a true appropriation, meaning that if a government shutdown occurs or the yearly appropriation runs out early, SNAP will be left without the necessary funding to issue benefits – creating stress and uncertainty for both the administering agencies and customers. By fully funding SNAP, states would not have to go through burdensome planning processes each year, and customers would not be without benefits due to no fault of their own.

Direct the Secretaries of the Departments of Agriculture and Health and Human Services to assess best practices and the feasibility of establishing standardized customer consent, data sharing, and customer rights language across SNAP and related programs. The purpose of this analysis would be to move closer to the creation of a universal consent language used across benefit programs to support better alignment in certifications in programs. This should work should engage FNS, CMS, and ACF, and result in a Report to Congress that includes clear identification of statutory policies that hinder the ability to further create this alignment.

Eliminate the requirement for state SNAP agencies to collect verification prior to closing a case for individuals that indicate they are ineligible or no longer wish to pursue a SNAP application. When SNAP applicants indicate they do not qualify or no longer wish to pursue an application, current law requires state agencies to obtain documentation or collect this declaration in writing prior to closing the case. If an applicant does not provide this information, states must leave the case open and follow normal rules to request additional information for the minimum time period permitted prior to closing the case. This results in unnecessary aggravation for customers, delays in application processing timeliness, and wasted time and resources spent trying to receive this verification from the applicant. Instead, there should be a different option that still includes transparent communication with applicants, such as a letter of voluntary denial.

Conclusion

As the 2023 Farm Bill process takes place, APHSA will continue to uplift the voices of our members - the administrators and implementors of SNAP policy. In the coming months, APHSA will be releasing a series of policy briefs that dive deeper into each of these focus areas including around improving customer experience, strengthening program integrity, and a mini-series on building an effective, simple, and customer-centered SNAP Employment & Training Program.

Keep track of all of APHSA's 2023 Farm Bill communications at

https://aphsa.org/APHSA/Focus_Areas/FarmBill2023

To connect about APHSA's 2023 Farm Bill Policy priorities, please reach out to **Matt Lyons, Senior Director for Policy and Practice** at mlyons@aphsa.org, and **Chloe Green, Senior Policy Associate for Food and Nutrition Services** at cgreen@aphsa.org.

Endnotes

- ¹ See <https://www.aarp.org/ppi/info-2022/boosting-snap-participation-among-older-adults.html>
- ² FNS and SSA are no longer soliciting proposals for new Combined Application Projects (see page 34) <https://fns-prod.azureedge.us/sites/default/files/snap/14-State-Options.pdf>
- ³ See <https://www.fns.usda.gov/snap/broad-based-categorical-eligibility>
- ⁴ See <https://www.urban.org/research/publication/how-working-families-are-affected-restricting-broad-based-categorical-eligibility-snap>
- ⁵ See <https://www.fns.usda.gov/snap/recipient/eligibility>
- ⁶ See <https://www.pewresearch.org/fact-tank/2022/03/23/key-facts-about-housing-affordability-in-the-u-s/>
- ⁷ Asset limits are currently \$2,750 for households unless they have an elderly or disabled household member, in which case the asset limit is \$4,250. See <https://www.fns.usda.gov/snap/recipient/eligibility>
- ⁸ See [https://uscode.house.gov/view.xhtml?req=\(title:7%20section:2015%20edition:prelim\)](https://uscode.house.gov/view.xhtml?req=(title:7%20section:2015%20edition:prelim))
- ⁹ See <https://www.ecfr.gov/current/title-7/subtitle-B/chapter-II/subchapter-C/part-273/subpart-C/section-273.7>
- ¹⁰ The recommendation to extend non-merit flexibilities for determining appropriateness of E&T components is separate from rules related to determining exemptions from the general and ABAWD work requirements.
- ¹¹ See https://www.urban.org/sites/default/files/publication/104451/the-impact-of-snap-able-bodied-adults-without-dependents-abawd-time-limit-reinstatement-in-nin_0.pdf
- ¹² See <https://www.ecfr.gov/current/title-7/subtitle-B/chapter-II/subchapter-C/part-273/subpart-H/section-273.26>
- ¹³ This fund was increased from \$90 million to \$103.9 million in the 2018 Farm Bill. <https://crsreports.congress.gov/product/pdf/R/R45525>
- ¹⁴ See 7 USC 2025(h)(1)(iv) for overview of current reallocation priorities at [https://uscode.house.gov/view.xhtml?req=\(title:7%20section:2025%20edition:prelim\)](https://uscode.house.gov/view.xhtml?req=(title:7%20section:2025%20edition:prelim))
- ¹⁵ See 7 USC 2029(c) at [https://uscode.house.gov/view.xhtml?req=\(title:7%20section:2029%20edition:prelim\)](https://uscode.house.gov/view.xhtml?req=(title:7%20section:2029%20edition:prelim)) and 7 USC 2015(o)(1) at [https://uscode.house.gov/view.xhtml?req=\(title:7%20section:2015%20edition:prelim\)](https://uscode.house.gov/view.xhtml?req=(title:7%20section:2015%20edition:prelim))
- ¹⁶ See TANF Final Rule for the 2005 Deficit Reduction Act <https://www.govinfo.gov/content/pkg/FR-2008-02-05/pdf/08-455.pdf>
- ¹⁷ See <https://www.ers.usda.gov/topics/food-nutrition-assistance/food-security-in-the-u-s/interactive-charts-and-highlights/>
- ¹⁸ See <https://www.luminafoundation.org/campaign/todays-student/>
- ¹⁹ See 7 CFR 273.9(c)(19) <https://www.law.cornell.edu/cfr/text/7/273.9>
- ²⁰ See <https://www.aeaweb.org/articles?id=10.1257/aer.p20171001>
- ²¹ See <https://aspe.hhs.gov/reports/best-practices-barriers-engaging-people-substance-use-disorders-treatment-0>
- ²² See <https://www.bread.org/sites/default/files/downloads/briefing-paper-mass-incarceration-february-2018.pdf>
- ²³ See 7 CFR 273.11(o) and (p) <https://www.law.cornell.edu/cfr/text/7/273.11>
- ²⁴ See <https://www.urban.org/research/publication/assessing-merits-photo-ebt-cards-supplemental-nutrition-assistance-program>
- ²⁵ See section 501 <https://www.congress.gov/bill/117th-congress/house-bill/2617/text>
- ²⁶ See 7 USC 2020(e)(2)(B)(iv) <https://www.law.cornell.edu/uscode/text/7/2020>