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## **Identifying Barriers in USDA Programs and Services; Advancing Racial Justice and Equity and Support for Underserved Communities at USDA**

Submitter: American Public Human Services Association

Areas of Submission: Area 1 (Equity Assessments and Strategies) and Area 2 (Barrier and Burden Reduction). General questions identified below.

### Organizational Overview:

The American Public Human Services Association (APHSA) is a bipartisan national membership association representing state and local health and human services agencies and the subject matter experts who help execute their mission to improve outcomes for people nationwide. Building on our long-standing relationships with health and human services leaders, we focus on generating pragmatic solutions that advance the well-being of individuals, families, and communities.

APHSA's membership includes the American Association of SNAP Directors (AASD), comprised of the national network of state SNAP Directors. Within this group, APHSA also engages state subject matter experts responsible for administering specific components of SNAP, including SNAP-Education, SNAP Outreach, and SNAP E&T programs.

APHSA has extensive expertise working with local, state, and federal government, including:

- Serving as a trusted broker connecting state and local human services leaders together to improve policy and practice;
- Representing the voice of human services agencies to inform national policies that reflect what works for implementers on the ground to achieve desired outcomes;
- Building capacity of human services agencies through our Organizational Effectiveness consulting team that deploys proven tools and methodologies to strengthen organizational readiness to drive systems level change;
- Partnering with federal agency leadership and career staff to strengthen the relationship between federal, state, and local agencies that administer human services and related programs to advance shared outcomes that promote social and economic mobility and move the health and human services field upstream to prevent issues before they happen;
- Supporting USDA FNS as a grantee for its [SNAP E&T National Partnerships Grant](#) initiative.

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*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**

Understanding the root causes and outcomes of structural inequities and systemic racism in human services is an essential part of our work at APHSA. We must center equity in our work to move toward a system where human services promotes well-being and supports communities in reaching their potential. The following reflections and recommendations speak specifically to policies and practices within the USDA Food and Nutrition Service, but we encourage you to also read [our response](#) to the *Methods and Leading Practices for Advancing Equity and Support for Underserved Communities through Government Request for Information from the Office of Management and Budget*.

### *Area 1 (Equity Assessments and Strategies)*

*Are there USDA policies, practices, or programs that perpetuate systemic barriers to opportunities and benefits for people of color or other underserved groups? How can those programs be modified, expanded, or made less complicated or streamlined, to deliver resources and benefits more equitably?*

We have identified several policies and practices within SNAP that too often perpetuate systemic barriers to opportunities for people of color and people within other underserved groups. APHSA has summarized some of the most significant policy areas in need of review below. Specific areas of reform related to SNAP community engagement and administrative burden are discussed in ensuing questions.

- The **Able Bodied Adults Without Dependents (ABAWD) work requirement** associated with SNAP has disparate impacts on Black and Latinx people and communities<sup>1</sup> that reduce participation in the program but have been shown to be ineffective in increasing gainful employment that leads to family-sustaining earnings.<sup>2</sup> A different approach is needed to address root causes of barriers to engaging in the workforce.
- **SNAP Employment and Training (E&T)** can be used to address some barriers to employment, but the program falls short in addressing deeper disparities in economic mobility. Limited funding and a narrow focus on services for people who are work-ready curb the impact of the program. Furthermore, the overly complex rules associated with administering SNAP E&T contribute to siloed workforce programs that make it difficult to effectively integrate services in the program with the broader continuum of workforce and family supports that would best help people reach their potential.
- Another policy that perpetuates systemic barriers is the current restriction on **college student eligibility**. Recent evidence has reinforced that food insecurity among college students remains well above the national rate<sup>3</sup> and the overly restrictive limitation in SNAP participation among college students is a key contributor to this disparate outcome.

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<sup>1</sup> Brantley E, Pillai D, Ku L. Association of Work Requirements With Supplemental Nutrition Assistance Program Participation by Race/Ethnicity and Disability Status, 2013-2017. *JAMA Netw Open*. 2020;3(6):e205824. doi:10.1001/jamanetworkopen.2020.5824

<sup>2</sup> L. Wheaton, T. Vericker, J. Schwabish, T. Anderson, K. Baier, J. Gasper, N. Sick, K. Werner. The Impact of SNAP Able-Bodied Adults Without Dependents (ABAWD) Time Limit Reinstatement in Nine States. June 2021. Urban Institute. <https://fns-prod.azureedge.net/sites/default/files/resource-files/ABAWDTimeLimit.pdf>.

<sup>3</sup> N Freudenburg, S Goldrick-Rab, J Poppendieck. College Students and SNAP: The New Face of Food Insecurity in the United States. 2019. *CUNY Academic Works*. CUNY Graduate School of Public Health & Health Policy.

[https://academicworks.cuny.edu/cgi/viewcontent.cgi?article=1302&context=sph\\_pubs](https://academicworks.cuny.edu/cgi/viewcontent.cgi?article=1302&context=sph_pubs)

- Current **resource limits** of \$2,250 (or \$3,500 for households with a disabled or elderly member) exacerbate the intergenerational wealth gap and contribute to systemic barriers to economic mobility for people experiencing poverty. Reassessing current rules so that people can save for weathering future emergencies and plan for their family's future without losing essential nutrition supports is an important step to providing people meaningful opportunity for upward mobility.
- Although many states have lifted the federal lifetime ban for SNAP for individuals with **drug-related felonies**, [almost half of states](#) still retain at least a partial ban. With Black Americans being arrested at close to [three times the rate](#) of their white counterparts for drug-related offenses, this federal policy option inequitably affects Black individuals and households. No matter someone's past, people deserve the right to afford food for themselves and their families, and SNAP can serve as an essential vehicle to help stabilize households when re-entering society.
- SNAP remains an important health and economic support in tribal communities that do not administer the Food Distribution Program on Indian Reservations (FDIPR). However, state agencies are frequently limited in their knowledge and ability to offer culturally responsive services to maximize the value of SNAP in these communities. Targeted technical assistance and opportunities to foster collaboration to support **increased autonomous administration of SNAP by Indian Tribal Organizations (ITOs)** is an important step to counteract systemic barriers faced by tribal communities.
- Current federal **SNAP policy does little to systematically promote and support investment in service delivery improvements** that can remove barriers to accesses and engaging in SNAP. While [small grant opportunities](#) have helped seed process improvements, the broader Quality Control framework – which uniformly focuses on program integrity metrics – and the relative lack of federal financial participation for SNAP administration compared to other means-tested benefits and services contributes to a federal framework centered on compliance rather than customer service and innovation. The disinvestment in customer service is an important contributor towards persistent barriers faced by underserved communities.
- Another harmful USDA [policy](#) is the **requirement of caseworkers to assign an ethnicity and race to a SNAP applicant** if they choose not to self-identify. This contributes to implicit bias and forces the caseworker to make assumptions based off one's visual appearance that may be far from the truth. It also relies on the caseworker's own experiences and associations rather than understanding the applicant's unique circumstances. Instead of this requirement, caseworkers should be instructed to leave the ethnicity and race information blank, as is the policy for telephonic interviews or others when the caseworker is unable to see the applicant.

*How can USDA establish and maintain connections to a wider and more diverse set of stakeholders representing underserved communities?*

According to the [SNAP-Ed Plan Guidance](#), to perform SNAP-Ed at a location other than a specifically qualified location (such as a food bank or pantry), it must be documented that at least 50% of people are at or below 185% FPL. Additionally, for some states that use Broad-Based Categorical Eligibility (BBCE) and use 200% FPL as the eligibility marker for SNAP, but the SNAP-Ed requirement remains at 185% FPL. This makes it difficult for SNAP-Ed providers to work in certain locations or organizations, especially those who are not able to provide this

data and perform policy, systems, and environmental change (PSE) work. The Healthy Hunger-Free Kids Act in 2010 broadly allows USDA to determine criteria for communities with a significant low-income population and loosening the current restrictions so states can categorically qualify communities reasonably expected to include a significant number of people income-eligible for SNAP would allow more people to benefit from the SNAP-Ed program.

### *Area 2 (Barrier and Burden Reduction)*

*Does USDA currently collect information, use forms, or require documentation that impede access to USDA programs or are not effective to achieve program objectives? If so, what are they and how can USDA revise them to reduce confusion or frustration, and increase equity in access to USDA programs?*

Administrative burden has a real and consequential role to raise barriers to accessing benefits, and there are a wide range of rules within SNAP that should be reassessed with an equity lens to address structural barriers. APHSA has summarized some of the most urgent areas of action that are needed below.

- **Revisit SNAP interview requirements:** According to our recent report on [SNAP Waivers and Adaptations During the COVID-19 Pandemic](#), only one-third of states believe that current interview requirements in the program are a best practice, with numerous alternative methods identified as of interest by states. While states may differ in their preferred alternative approaches, what is clear is that a universal one-size-fits-all approach to mandating interviews is not the best path forward to equitably serve people with different needs. USDA can immediately address this by working with states interested in testing alternative strategies for conducting interviews and using lessons learned to adjust SNAP regulations accordingly.
- **Revisit recertification requirements:** Ongoing implementation of the [Elderly Simplified Application Project](#) has been highly valued by participating states as a means to simplify the program for eligible households. This demonstration should be made a permanent option so more states can fully incorporate it into their program. Additionally, recent COVID-19 flexibilities to adjust periodic reporting and recertification rules have triggered further thinking among states for how additional simplifications could ease administrative burden on SNAP recipients while preserving program integrity. With technology providing new opportunities for people to share updates on possible changes in household circumstances, there is ample opportunity for a new round of demonstration projects to look at more flexible ways of capturing change reporting so people do not lose benefits as a result of rigid administrative rules. USDA should work with states interested in engaging in strategies that break down barriers to program access.
- **Align administrative requirements across benefit programs:** When individuals apply for SNAP, they must be viewed as a whole person in the system of human services. To ease their burden, administrative requirements across programs should be aligned to be more consistent, thus reducing the confusion and duplicative efforts for the household. For example, current SNAP policy on how third party payroll sources can be used to verify household information require state agencies to go through additional steps to contact clients to confirm information that is not necessary for TANF or Medicaid – despite the fact that the client may be applying for all three programs through a single application. Aligning these administrative rules has a direct impact on improving equitable access.

*Are there data-sharing activities in which USDA agencies should engage, so that repetitive collections of the same data do not occur from one USDA component to the next?*

Sharing data across benefit programs, such as SNAP, WIC, and the NSLP helps to decrease barriers for families to sign up for all of the nutrition support programs that can help their household reach well-being. The [Direct Certification Improvement Grant](#) program was essential to recent successes in increasing the number of children categorically eligible for school meals without having to go through redundant application processes.

Recent challenges and trends point to the next wave of investment needed in interoperability to reduce repetitive information collection and help families better access services across USDA nutrition programs. The significant delays in implementing the Pandemic EBT program highlight the lack of infrastructure in place throughout the nation to rapidly issue EBT benefits to children receiving school meals who were not already enrolled in SNAP. Investments in stronger and standardized data governance within school meals programs, as well as improved interoperability with SNAP agencies, could bolster the resiliency of and coordination between SNAP and other child nutrition programs.

Additionally, while SNAP reaches most eligible families with young children, WIC has a much lower coverage rate. States can leverage data from SNAP (as well as Medicaid and other programs) to identify and cross-enroll families into WIC. However, because these programs are frequently administered by separate agencies and have separate application processes and different funding streams, implementing automated data matching, outreach, and cross-enrollment mechanisms remains a challenge for many states. Focused funding and joint technical assistance and policy guidance across FNS programs is needed to create lasting alignment. APHSA is [currently working](#) with a cohort of five state and one local SNAP agency to increase coordination across these programs and others to reduce childhood hunger, with a centering focus on racial equity.

*How can USDA use technology to improve customer service? Do you have suggestions on how technology or online services can help streamline and reduce regulatory or policy requirements? What are those technological programs or processes and how can USDA use them to achieve equity for all?*

The COVID-19 pandemic highlighted the importance of technology to preserve access to SNAP and revealed where we have shortcomings that contribute to customer service challenges. Listed below we have included several of the most important insights SNAP agencies have learned about how technology can be used to strengthen SNAP's customer service as a means to achieve equity for all.

- **Telephonic signatures:** The option to collect telephonic signatures without requiring an audio recording was highly favorable by participating state and local agencies in response to the pandemic. This allowed agencies that did not have the prior capacity to audio record signatures to support individuals in receiving their benefits without needing to travel into the office.
- **Web and mobile applications and verifications:** As evidenced in our recent report on [SNAP Waivers and Adaptations During the COVID-19 Pandemic](#), states were able to support remote access to SNAP applications, reporting, and document upload via a mix of telephonically, online, and mobile options. However, these capabilities differed state-by-state and additional resources are needed to build additional client-centered tools to apply for and maintain SNAP benefits.

- **EBT Technology:** Significant mailing delays, card stock shortages, and challenges issuing benefits to the correct mailing addresses, particularly in P-EBT, revealed the limitations in EBT technology during the COVID-19 pandemic. These issues will only become more prevalent as technology continues to evolve and the way people purchase goods changes in tandem. Investing in state capacity to issue benefits via virtual wallets can provide more secure, real-time issuance of benefits that avoids much of the common constraints of current EBT technology. Furthermore, solutions put forth should be designed to address the lack of competition in the EBT market, which currently contributes to unnecessary costs and a lack of resiliency in times of crisis or increased demand. Better tools that equip people receiving benefits with more convenient redemption options plays an important role in achieving equity for all.
- **Online Purchasing** – USDA should be commended for its efforts to rapidly expand the Online Purchasing Pilot in 2020 in response to the COVID-19 pandemic. However, significant barriers remain to scaling up online purchasing throughout the country so that SNAP and WIC recipients with transportation barriers can redeem benefits from their home. Building up capacity for retailers, particularly those in communities with limited grocery options, to participate in online purchasing is needed. Furthermore, the cost of covering delivery fees remains a significant barrier for SNAP recipients to take advantage of the online purchasing option. FNS can support state and local agencies that are interested in offsetting these fees (using non-SNAP funds) by helping develop technology that SNAP recipients would need to use to securely make an online purchase while having their delivery fee be covered through other funding sources.