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Recommendations to Strengthen the Impact of SNAP-Ed on Food and Nutrition Security:

Perspectives from State SNAP-Ed Agency Leaders

January 2023

Food and nutrition security are essential to health and well-being, and the Supplemental Nutrition Assistance Program (SNAP) provides support to individuals, families, and communities to help them afford nutritious diets. SNAP Education (SNAP-Ed) is the voluntary nutrition education arm of SNAP that helps SNAP participants and people with low-incomes purchase and prepare affordable, nutritious meals. SNAP-Ed 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.

In the fall of 2020, the American Public Human Services Association (APHSA), the bipartisan, national association for state and local human services agencies that administer programs such as SNAP, created a specialized work group for state agency staff that lead the planning and implementation of SNAP-Ed. The work group was initially intended to help state agency leaders connect with their peers about the many programmatic changes taking place during the pandemic but has grown to address a broader range of ongoing SNAP-Ed administrative issues, such as virtual programming, community partnerships, implementation of PSE, and racial equity. The SNAP-Ed work group regularly engages SNAP-Ed leaders from a bipartisan group of 20 states across the country through bimonthly virtual meetings with opportunities for peer sharing, discussion, and learning from external partners. The group will continue to expand opportunities for states to participate and address nutrition security and access to SNAP, which are top priorities for APHSA and the Farm Bill.

As a national convening space for state SNAP-Ed administrators, the APHSA SNAP-Ed work group is well-positioned to identify key challenges related to SNAP-Ed planning, administration, and reporting and to recommend policy solutions to address these challenges. Recognizing an opportunity to influence the upcoming 2023 Farm Bill, communicate state priorities with the new SNAP-Ed branch of USDA, and expand the impact of SNAP-Ed as a response to the White House Conference on Hunger, Nutrition, and Health, APHSA invited states to participate in a SNAP-Ed Policy Lab. Agency leaders were convened throughout 2022 both virtually and through an in-person working meeting to lay out a draft policy agenda. This brief provides policy opportunities and recommendations to address the challenges and opportunities to grow SNAP-Ed's reach and equitable impact on food and nutrition security.

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.

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I. Challenges Facing SNAP-Ed

The following points outline key challenges that must be addressed for state agencies to expand the impact of SNAP-Ed and to administer a more equitable program.



Defining target audience and site eligibility for SNAP-Ed programming: In order to use SNAP-Ed funds, programs are required to serve the SNAP-Ed target audience, which is defined by the Secretary of the USDA as “people who receive SNAP or a community where at least 50% of the population has low income.” For a site (e.g., a school or retailer) to be eligible for SNAP-Ed programming, the state agency must

submit data to USDA to demonstrate that the population served at the site meets these criteria. This process for qualifying eligible sites is challenging for several reasons. First, it is highly dependent on data availability and the level at which data are aggregated. For example, schools generally have good data on SNAP participation due to direct certification requirements, in which students receiving SNAP are automatically enrolled in school meal programs. However, other sites, such as small grocers, may not have access to accurate or timely data, or may need to rely on data (such as those collected by the Census) that are not representative of the population served. Tribes may also not have the same level of data available as other localities, thus resulting in need being missed. Second, it is difficult to qualify sites in which there are frequent population shifts. For example, restaurants located in business districts may reach a large number of lower income workers during the workday despite locating in relatively high-income census tracts. Similarly, popular vacation destinations see marked shifts in population demographics over the course of the year, which may disqualify sites during the “high season” that would otherwise be eligible. Lastly, the expansion of online purchasing offers an opportunity to reach SNAP participants by working with online retailers such as Amazon and Instacart; however, these retailers are not currently eligible to receive SNAP-Ed due to their diverse clientele.



Balancing the SNAP Promotion Rule with SNAP-Ed activities: The SNAP Promotion Rule prohibits activities that are designed to recruit people to SNAP and specifically bans the promotion of SNAP benefits in television, radio, or billboard advertisements. The rule has left SNAP-Ed professionals unclear about whether certain educational efforts may violate the SNAP Promotion Rule. For example, some states

have shared that clarity is needed on the extent to which their SNAP-Ed team can partner with SNAP Outreach to make referrals if people participating in SNAP-Ed programming but not receiving SNAP.



Designing culturally relevant programming: Using a racial equity lens to evaluate the systems and structures that have created an environment where people of color historically face higher rates of food and nutrition insecurity is critical to improve health and well-being. Because SNAP-Ed interventions happen not only at the individual level but also at the community level, they must be both accessible and culturally relevant to have long lasting impact. For example, programs developed for

Tribal communities must recognize the importance of traditional knowledge, values, and practices, and

incorporate Tribal language and relevant foods for it to be impactful for tribes. In program design, states struggle with balancing the need to center BIPOC communities and develop community-specific curriculum such as by incorporating relevant cultural adaptations, while also making sure that the curriculum meets FNS standards for being evidence-based.



Assessing program outcomes and evaluations: State agencies overseeing SNAP-Ed are required to conduct evaluations of their programming. While the SNAP-Ed Evaluation Framework supports agencies in understanding what outcomes to track, it can be challenging to actualize the framework, especially for PSE and virtual programs. Challenges include study design, selection of relevant outcomes, measurement, and ongoing engagement with program partners to assess long term

impacts and health behavior changes that are directly associated with SNAP-Ed interventions. States need support from their federal and regional partners in developing tailored evaluation plans that help to understand more qualitative and community-based outcomes.



Partnering across state and federal agencies and nutrition education programs:

There are many stakeholders involved in the implementation of SNAP-Ed, and individual programs vary widely across the country in how they are staffed, administered, and evaluated. To communicate with FNS, state agencies work closely with one of seven SNAP-Ed regional offices who serve as the liaisons between the states and FNS National Office. While regional offices serve an important purpose to

provide regular feedback, there are certain challenges associated with this dynamic. These include a feeling of disconnect between states and their national partners, as well as differing communication levels and content shared across the regions. There also remain questions as to how SNAP-Ed can partner with other nutrition education programs such as the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) and the Expanded Food and Nutrition Education Program (EFNEP). While all of these programs have similar purposes, there are no formal pathways for their collaboration.



Limited staff capacity: The current calculation for SNAP-Ed state allotments is based both on the ratio of SNAP participants in that state compared to the national total and on the state's expenditures for SNAP-Ed in fiscal year 2009 (of note, the calculation does not include FDPIR populations, who are eligible for SNAP-Ed programming). Even after the recent 2% increase in SNAP-Ed funding, many states continue to struggle with their staffing capacity to perform all roles of the state agency for SNAP-

Ed including managing contracts, reporting requirements, and creating new ideas to expand the impact of the program.

II. Opportunities to Expand the Reach and Impact of SNAP-Ed

After multiple virtual meetings to discuss policy priorities in late 2021 and early 2022, APHSA's SNAP-Ed work group met in person in August to put pen to paper on what is most needed to advance the mission of SNAP-Ed and what it will take to make it happen. The following key points were identified as critical areas to address to improve and expand the impact of SNAP-Ed:

1. State agencies need **more regular engagement** with their peers, regional FNS representatives, and partners to better understand what is happening in SNAP-Ed across the country. This will help states work together to develop new projects and identify gaps in programming.
2. SNAP-Ed programs would benefit from **more flexibility in identifying eligible sites** for programming that more accurately reflect the need of people and communities, including more accounting for FDPIR populations. The current requirement of site-based programming limits the ability of SNAP-Ed agencies to serve households experiencing poverty that would benefit from nutrition education.
3. SNAP-Ed is only one of several federal programs with a nutrition education component. SNAP is too often siloed from programs such as the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) and the Expanded Food and Nutrition Education Program (EFNEP). States would like to see **federal leadership on creating more opportunities to integrate programs** that ultimately provide better, more seamless access to nutrition education for individuals and families.
4. The current requirements outlined in the SNAP-Ed plan guidance for evidence-based curricula limit SNAP-Ed in partnering with community members to create more **equitable programming** to best serve different communities. For example, tribal leaders may have insights into what curriculum would be most informative for their fellow community members, but this may not meet the standards that FNS requires for evidence-based curriculum. States need more flexibility on what is considered evidence-based, funding to support these efforts, and resources and technical assistance from their FNS partners to help approve curricula that has proven to be successful through other, community-based methods.
5. To better understand the impacts and outcomes of SNAP-Ed, state agencies need more **guidance and assistance on program evaluation**. As part of the SNAP-Ed toolkit, administrators need detailed guidance on how to design an impactful evaluation, including recommended study designs, outcome measures, and measurement tools. These resources are especially needed for evaluation of PSE strategies to help communicate its growing impacts on communities.
6. State SNAP-Ed staff need additional **support and resources** for program planning, implementation, and evaluation. Too often states are understaffed and under-resourced for SNAP-Ed, leaving agencies spread thin across all program needs.

III. Policy Recommendations

Based on the identified opportunities for impact, APHSA offers the following recommendations.

Recommendations for the USDA Food and Nutrition Service

Host an annual, in-person meeting for SNAP-Ed state administrators, implementing agencies, and national partners. State agencies have expressed a strong desire for regular engagement with peers in other states and partners at FNS. An annual meeting would provide dedicated space to share what is working in each state, learn promising practices from peers, and explore opportunities for cross-state partnerships. Benefits of an annual meeting include: 1) an opportunity for states to discuss and inform the annual SNAP-Ed plan guidance, 2) collaboration between FNS regions, State Nutrition Action Councils (SNACs), and state agencies to consider regional or nationwide opportunities for programming, and 3) discussion on how to tackle recent program changes that may emerge from the Farm Bill or other policy. This meeting can be hosted by FNS or be a part of a partner convening that has a focus on SNAP-Ed.

Include examples of programming in the SNAP-Ed toolkit that align nutrition programs and embed cultural diversity. SNAP-Ed state agency staff want to better align their program with other nutrition education programs in a way that expands reach and minimizes burden for both the implementors and customers. State agencies would like to see more specific examples in the SNAP-Ed toolkit of how to explore these partnerships within current authority. They would also like to see examples of how to adapt their nutrition education curricula to meet the needs of a diverse audience, such as multi-generational families, participating together. States also highlighted interest in developing a curriculum that addresses food systems and root causes of food insecurity.

Expand guidance around multi-state partnerships and allowable activities. The current SNAP-Ed Plan Guidance permits multi-state partnerships but does not provide detail on or examples of the types of permitted activities. Multi-state partnerships with online retailers, in particular, require further guidance.

Provide individualized technical assistance on community-engaged evaluation of PSE interventions and other programming. As states increasingly shift to virtual SNAP-Ed programs and grow their PSE work, there is a need for additional evaluation support. Specifically, states are looking for guidance on how to equitably evaluate outcomes in communities of color, tribal nations, and diverse communities. States are interested in better understanding promising practices for community-defined success, resources for developing reporting and evaluation methods, and opportunities to work with independent evaluators.



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Re-evaluate the definition of the SNAP-Ed target audience and/or permit community-level eligibility criteria. USDA should re-evaluate the definition of the SNAP-Ed target audience to enable states to reach communities that are in need of SNAP-Ed services but currently ineligible. USDA could also consider certifying entire communities (e.g., counties or cities) instead of relying on Census tract-level data.

Clarify the restrictions and allowable activities for SNAP-Ed in relation to the SNAP Promotion Rule. SNAP-Ed state agencies require written guidance on what specific activities are permitted versus restricted under the SNAP Promotion Rule. Guidance should include examples of the types and content of communication about SNAP that SNAP-Ed professionals are permitted to share as well as specific allowable activities such as directing customers to where they can learn more about SNAP, how to enroll, and more. The guidance should also outline permitted partnerships, such as partnerships with SNAP Outreach.

Recommendations for Congress

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 PSE 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.



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SNAP-Ed is a critical tool to help end hunger and improve health and well-being in this country. While the program retains significant flexibility, it could benefit from updated guidance, technical assistance, and research to better understand the modern and changing landscape that the program is currently operating in, as well as how to expand the impact of the program. These policy recommendations offer SNAP-Ed state agency insight into ways we can improve and expand the impact of the program. As we look toward the 2023 Farm Bill, expansion of a new SNAP-Ed branch within FNS, and other changes to nutrition assistance programs, we are at a critical action point to strengthen these programs to benefit individuals and families for the long-term.

The convening of state agency staff at the 2022 APHSA Economic Mobility and Well-Being Conference, and this brief, were funded by the Bloomberg American Health Initiative at the Johns Hopkins Bloomberg School of Public Health and builds on prior work funded by Healthy Eating Research, a national program of the Robert Wood Johnson Foundation. To further discuss the recommendations in this paper, please reach out to Chloe Green, Senior Policy Associate for Food and Nutrition Services at the American Public Human Services Association at cgreen@aphsa.org.