

ASNNA Recommendations about Flexibilities Needed by SNAP-Ed Providers

The goal of SNAP-Ed is to reach as many as possible of the 87 million income-eligible people by offering evidence-based, multi-level interventions in as many ways and locations as possible, building on and complementing other USDA programs, especially SNAP, and working toward long-term solutions in partnership with other organizations. The following changes in the *SNAP-Ed Guidance* will reduce administrative barriers and enable SNAP-Ed State Implementing Agencies (SIAs) to provide more robust programming that reaches more people, more efficiently.

Needed Flexibility	What Is the Problem and Its Impact in States?	Recommended Change in the <i>SNAP Ed Guidance</i>
<p>Allow SNAP-Ed to provide information about changes in and the benefits of SNAP. This flexibility is needed so the SNAP-Ed infrastructure can be used to help reduce food insecurity and to support the SNAP-Ed mission of improving dietary quality, reducing diet-related health disparities, and helping to achieve the <i>Dietary Guidelines for Americans</i>.</p>	<p>Problem: The <i>SNAP Promotion Rule</i> prohibits SNAP State Agencies (SAs) from using recruitment activities that persuade, assist, or incent people to enroll in SNAP. However, the <i>Guidance</i> over-interprets the <i>Rule</i> to prohibit SNAP-Ed interventions from providing information about SNAP benefits and enrollment, except for basic information or links on handouts. (SNAP Promotion Rule. 7 CFR Parts 251, 271, 272, and 277. <i>SNAP-Ed Guidance</i>, pages 3-4.)</p> <p>Impact: This interpretation prohibits SNAP-Ed from providing information about changes in SNAP such as eligibility and benefits, P-EBT, and Online EBT to its diverse audiences and partners. With its sizable reach into communities, the economic downturn, and its focus on health, SNAP-Ed should be able to provide information and education about the health benefits of SNAP to the large numbers of consumers who may be newly eligible for SNAP or unaware of changes in SNAP benefits.</p>	<p>Clarify that the <i>SNAP Promotion Rule</i> allows SNAP-Ed interventions to include information and education about SNAP eligibility and benefits.</p>
<p>Simplify restrictive income targeting criteria for community sites, settings, and social marketing campaigns.</p>	<p>Problem: SNAP-Ed programming may be offered only in sites, settings, and media channels where $\geq 50\%$ of the audience has a gross income $\leq 185\%$ <i>Federal Poverty Guidelines (FPG)</i>; alternative methods cited in the <i>Guidance</i> to qualify schools, retail food stores, census tracts/blocks, rural areas, and worksites are impractical for many SIAs; and qualifying data for the community or organization levels are often out-of-date or not available at all (<i>Guidance</i>, pages 41-53).</p> <p>SNAP-Ed programs also are prohibited in sites where income-related data are unavailable and in locations, places, and systems that can reach high numbers of eligible people when some locations do not reach the $\geq 50\%$ criterion, even though the partnering organization supports introducing policy, systems and environmental changes (PSE) at its own expense.</p>	<p>Modify income-targeting criteria to include:</p> <p>Geographic areas such as rural communities that have few or no qualifying census tracts: Allow area wide SNAP-Ed interventions in counties, cities, towns, and districts with high proportions (but not a majority) of income-eligible residents. In rural areas, allow SNAP Ed to work in census tracts with the highest share of the income-eligible audience.</p> <p>Worksite Wellness Initiatives: Allow interventions in locations with a high share of workers in low-wage occupations such as agriculture, food</p>

	<p>Impact: Allowing majority-only sites and settings denies services to the large numbers of people in the SNAP-Ed audience who can be reached in mixed-income settings like worksites and churches. This targeting rules out large-scale, cost-effective efforts, such as through entire school districts or company-wide interventions because not all sites qualify. It also limits mass communications because TV, radio, newspapers, outdoor, and transit channels have few venues that meet the $\geq 50\%$ usage criterion.</p>	<p>service, hospitality, and childcare. Do not require wage documentation. Districts and companies with mixed income sites: Allow organization wide interventions when a higher number of income-eligible people can be reached than if only eligible sites were allowed, such as school districts and chain supermarkets. Mass communications: For social marketing campaigns, allow the use of the best available media outlets for reaching high proportions of the income-eligible audience.</p>
<p>Harmonize SNAP-Ed and SNAP eligibility criteria.</p>	<p>Problem: 18 states have established SNAP eligibility at 200% of the FPG using the Broad-Based Categorical Eligibility provision, but in some states, eligibility for SNAP-Ed is held to the lower level of 185% FPG, as in the <i>Guidance</i>.</p> <p>Impact: Excludes SNAP participants and community sites that are entitled to receive SNAP-Ed programming. Unnecessarily complicates the planning and implementation of community services and with partners.</p>	<p>Define the SNAP-Ed audience as being people with incomes at or below 185% of the FPG or the state's gross income limit for SNAP, whichever is greater.</p>
<p>Streamline the amendment process for state plans to allow funds to be redirected toward unexpected demands and to adjust programming to changing conditions by eliminating lengthy prior approval processes.</p>	<p>Problem: SNAP SAs are required to amend their State Plan whenever new/revised activities result in a change of $\geq 5\%$ in the total budget, including for emergencies such as COVID, and for substituting allowable activities, even though no increase in the total budget is involved. (7 CFR 272.2(f) and pages 60-68). SAs must compile information from SIA grantees months in advance to meet Federal due dates.</p> <p>Impact: Nearly half the states have multiple SIAs, with the average being 5 SIAs. SIAs prepare and submit their budgets to the SNAP SA months in advance of each fiscal year. Since some FNS Regions allow only 2 amendments each year, the last date for any submission is May 1, and processing may take 2-6 months, flexibility in adjusting programs in response to changing needs is limited.</p>	<p>Require amendments to the State Plan only when there is need for additional Federal funding or when the change that is 5% or greater of the total program budget includes activities defined as unallowable.</p>

For *SNAP-Ed Guidance*, click Program Administration on this website: <https://snaped.fns.usda.gov>

Flexibilities Needed in *Guidance*

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