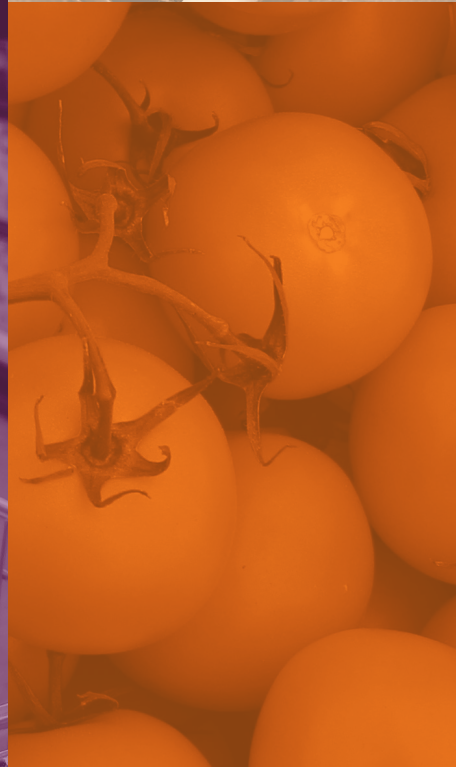


CLOSING THE SNAP GAP

RECOMMENDATIONS
TO PREVENT HUNGER
AND STRENGTHEN
SNAP IN HOUSTON



LETTER FROM THE HOUSTON SNAP TASK FORCE



As co-chairs of the Houston SNAP Task Force, we are pleased to present this report outlining our Task Force's policy recommendations for increasing enrollment in SNAP within Houston.

Despite a growing body of research documenting SNAP's positive impacts on food insecurity, public health, economic development and overall quality of life, more than one in five eligible Houstonians are missing out on SNAP benefits that would help them purchase food.

The Houston SNAP Task Force was convened based on the understanding that a strong **Supplemental Nutritional Assistance Program (SNAP) is essential in the fight to eliminate hunger in Houston**, and that everyone has a stake in the work. SNAP, formerly known as "food stamps," is the nation's first line of defense against poverty and hunger. Despite a growing body of research documenting SNAP's positive impacts on food insecurity, public health, economic development and overall quality of life, more than one in five eligible Houstonians are missing out on SNAP benefits that would help them purchase food.

Composed of over 40 individuals from the public, private and nonprofit sectors, including community-based partners, health care providers, food retailers, philanthropy, and individuals with experiential knowledge of hunger and SNAP, the Task Force met to explore barriers to SNAP participation and identify policy recommendations that build upon the strides Texas and Houston have made over the last decade to serve more eligible people. As part of the process, stakeholders shared their particular experiences and expertise on the various aspects of SNAP operations in Houston: administering SNAP, redeeming benefits and assisting SNAP applicants.

The SNAP recommendations in this report build upon decades of leadership around eliminating hunger, and best practices and policies, including some already in operation in Texas such as the Standard Medical Deduction and the Community Partner Program. It is our hope that this report will be used as a tool for further advocacy and action.

Everyone deserves access to affordable, nutritious food.

We are confident that Houston stakeholders will continue to lend time and resources to help bring these recommendations to fruition in the years ahead. We thank all the Houston SNAP Task Force members for their time and insights, and Target for its support of this work.

Sincerely,

Brian Greene, Co-Chair
President & CEO
Houston Food Bank

Dr. Bob Sanborn, Co-Chair
President & CEO
CHILDREN AT RISK

Houston SNAP Task Force Members

Abel Martinez · Group V.P. of Partner Relations, Risk Solutions, and Government Affairs · H-E-B

Amber Weed · Senior Policy Advisor · Office of Harris County Commissioner Rodney Ellis

Andrea Sicheluff · Research Assistant · The University of Texas Health Science Center at Houston

Astoria White · Senior Health and Wellness Administrative Coordinator · BakerRipley

Betti Wiggins · Officer of Nutrition Services · Houston Independent School District

Bryan Bolton · Director of Business Development · Patient Care · Intervention Center

Celia Cole · Chief Executive Officer · Feeding Texas

Cynthia Colbert · President & CEO · Catholic Charities of the Archdiocese of Galveston-Houston

Danielle Bolks · Senior Program Director · YMCA of Greater Houston

Dr. Daphne Hernandez · Associate Professor, Department of Health & Human Performance; Director, HOUSTON Academy · University of Houston

Dorian Cockrell · Senior Manager, Workforce Development, THRIVE · United Way of Greater Houston

Dya Campos · Director of Governmental and Public Affairs · H-E-B

Emily Adlparvar · Program Coordinator · The University of Texas Health Science Center at Houston

Felicia Jackson · Family Support Services Manager · Houston Area Urban League

Gary Huddleston · Food Industry Consultant · Texas Retailers Association

Gwen Sims · Division Director, Nutrition and Chronic Disease Prevention · Harris County Public Health

Jamie Olson · Policy Analyst · Feeding Texas

Jane Vo · Former Senior Program Director · Chinese Community Center

JC Dwyer · Chief Strategy Officer · Feeding Texas

Jessica Flynn Saldaña · Customer Insights Manager · H-E-B

Jimmieka Mills · Consultant

Joe Williams · Former Vice President, Regulatory & Member Services · Texas Retailers Association

Joey Palacios · District Supervisor · Lewis Food Town, Inc.

Johannah Thompkins · Community Engagement Coordinator · Office of Harris County Commissioner Rodney Ellis

Kathy Lipman · Senior Box Program, Manager · Houston Food Bank

Kathy Sweidel-Caton · Vice President of Communications, Lewis Food Town, Inc. · Food Council Chairwoman, Texas Retailers Association

Katie Chennisi · Public Health Analyst · Healthy Living Matters, Harris County Public Health

Lance Gilliam · Partner · Waterman Steele

Linsi Broom · Former Community Liaison · Houston Health Department, City of Houston

Lisa Guitguit · Director of Operations · YMCA of Greater Houston

Lisa Helfman · Founder & Board Chair · Brighter Bites

Maggie Sun · Social Benefits Manager · Chinese Community Center

Mandi Kimball · Director of Public Policy and Government Affairs · CHILDREN AT RISK

Marlene Vasquez · Client Assistance, Program QA & Compliance · Houston Food Bank

Mary Ann Welch · Health and Wellness Supervisor · Houston Area Urban League

Marycruz Bazan-Nila · Client Assistance Program Coordinator · Houston Food Bank

Megan Hoag · Regional Director · Texas Hunger Initiative – Houston Regional Office, Baylor University

Mike Pomeroy · Senior Program Director · Brighter Bites

Oleg Jolic · Chief Services Officer · Houston Food Bank

Omar Fortune · Senior Workforce Planner · Workforce Solutions – Gulf Coast Workforce Board

Rolonda Clements-Martin · Job Connection Manager/Program Manager · Goodwill Houston

Roxane May · Disproportionality and Disparities Specialist · Texas Health and Human Services Commission Region 5

Sarah McIntire · Government Relations Officer · Houston Food Bank

Sharon Zachary · CEO · Alliance of Community Assistance Ministries, Inc.

Sherri Onyiego · Chronic Disease Prevention Physician · Harris County Public Health

Stephanie Berno · Director of Outreach Services · Houston Food Bank

Tina Tran · Director, Outreach & Advocacy · AARP Texas State Office · Houston

Toral Sindha · Houston and Harris County Regional Director, Clinton Health Matters Initiative · Clinton Foundation

Trina Taylor · Client Assistance Program, Associate Director · Houston Food Bank

Dr. Umair Shah · Executive Director · Harris County Public Health

Warren Wenner · Vice President · Meals on Wheels for Greater Houston/Galveston County; Interfaith Ministries for Greater Houston

ADVISORS

Daniel Magbo · Field Policy – Region 6 · Texas Health and Human Services Commission · AES – Access & Eligibility Services

Gracie Perez · Regional Director – Region 6 · Texas Health and Human Services Commission · AES – Access & Eligibility Services

J. Hoxi Jones · Regional Partnership Specialist · Texas Health and Human Services Commission · AES – Access & Eligibility Services

CO-CHAIRS

Dr. Bob Sanborn · President & CEO · CHILDREN AT RISK

Brian Greene · President & CEO · Houston Food Bank

EXECUTIVE SUMMARY



The Supplemental Nutritional Assistance Program (SNAP), formerly known as “food stamps,” is the nation’s first line of defense against poverty and hunger, and has been proven to be an effective, efficient source of temporary assistance for families in need. Not only does SNAP help lift families out of poverty, but every federally funded SNAP dollar generates \$1.79 in economic activity, supporting farmers, food producers, food retailers and other businesses, and creating jobs in the Houston area. Those resources are used to purchase food at SNAP-authorized grocery stores, convenience stores, community-supported agriculture (CSA) shares, military commissaries and other outlets.

In 2016, SNAP served an average of 672,219 persons in Houston, bringing in \$979,841,468 of federally funded benefits that in turn generated \$1,753,916,228 in economic activity. SNAP’s contributions to Houstonians’ well-being could be bolstered by reaching the over 1 out of 5 people (22.3%) who are “eligible but not enrolled” (EBNE) in SNAP. The Houston SNAP gap leaves an estimated 193,551 Houstonians eligible for but not receiving SNAP benefits.¹

This means that each year, Houston has over \$110 million of unclaimed SNAP benefits that could otherwise provide groceries for children, seniors and families who need help. Since every \$1 of additional SNAP benefits generates \$1.79 of economic impact, this is equivalent to a loss of nearly \$197 million to grocery stores, farmers and other local food retail suppliers. This money also supports the food supply chain, including Texas farmers.²

Recognizing the importance of tackling Houston’s SNAP gap, local and state leaders have agreed to identify policies and practices that could strengthen SNAP’s performance in Houston.

THE HOUSTON SNAP TASK FORCE

The Houston SNAP Task Force was convened by Houston Food Bank, Food Research & Action Center, and The Food Trust, and co-chaired by Houston Food Bank and CHILDREN AT RISK. The group included representatives from state and local government and private and non-profit leaders from community development, health, grocery, education, civic and anti-hunger sectors, and people with direct experience with SNAP. Feedback and advice was also obtained through focus groups comprised of a diverse set of low-income Houstonians.

The Task Force recommends support for immediate and longer-term strategies to improve and modernize SNAP administration, application assistance, and enrollment and benefit redemption. Efforts to increase participation in SNAP should dovetail with the state’s overall agenda to improve SNAP access and operations throughout Texas. The success of those efforts will benefit from coordinated action among all sectors: state and local government, health, education, community development, food retail, charitable service providers, philanthropy, and those with experiential knowledge of hunger and SNAP.

The Task Force recognizes that federal, state and local government all play roles in SNAP’s effectiveness. The report recommendations focus on changes that can help SNAP reach its full potential in Houston.

SUMMARY OF RECOMMENDATIONS



The Task Force sought to build upon ongoing efforts in Texas to improve SNAP access and to identify recommendations for the most readily achievable gains, high-impact policies and practices and long-term solutions for Houston.

Together, they are a call for Houston's civic leaders to elevate SNAP as a central strategy to eliminate hunger, expand the stakeholders who have been a part of this effort, and invest resources into an achievable, comprehensive plan.

I Policy Recommendations

- 1 Streamline SNAP enrollment for eligible Houston seniors** by a) enabling telephonic signatures for SNAP applications submitted by food banks participating in the Community Partner Program; and b) implementing an Elderly Simplified Application Project (ESAP) that shortens the application, creates a 36-month certification period, and provides for recertification without an interview for elderly participants with no earned income.
- 2 Conduct a post-Hurricane Harvey assessment of Disaster SNAP (D-SNAP) and SNAP**, and apply lessons learned to improve disaster planning and future recovery operations for Houston.
- 3 Broaden the monthly SNAP benefit issuance cycle** to better accommodate retailer operations under a transition plan that protects current SNAP clients from gaps in benefit receipt.

II Planning and Partnerships

Strengthen relationships and partnerships among a diverse group of Houston SNAP stakeholders, and apply neighborhood-based analysis for a Houston SNAP education and application assistance plan.

1 Create a strategic plan to reach vulnerable populations with a neighborhood-based approach that is informed by perceptions and stigma around SNAP. The plan would include demographic analysis of the SNAP eligible but not enrolled (EBNE) population, and set concrete goals to increase the enrollment rate of eligible Houston residents.

2 Create a Houston SNAP work group that meets periodically to share best practices, discuss current SNAP policy issues, and SNAP agency updates. This group would benefit from the participation of representatives from the Texas Health and Human Services Commission (HHSC), Harris County, and the City of Houston, as well as participation from groups including but not limited to SNAP clients, advocates, food retailers and stakeholders that serve seniors, immigrants, people with disabilities, veterans and military families, working families with children, and college students.

3 Designate an HHSC staff contact for external partner relationships to regularly communicate with Community Partners and other stakeholders about SNAP enrollment updates, HHSC policies and other announcements.

4 Consider ways to use funds more effectively and efficiently by screening to determine their job-related needs and barriers to employment and targeting E&T services to those most likely to benefit from that assistance.

5 Connect Community Partner Program participants with their local WIC sites to explore potential neighborhood-based partnerships and greater coordination efforts, such as SNAP outreach and application assistance at farmers markets located at WIC sites, or referral of WIC clients who have expressed food insecurity to local SNAP assistance sites. HHSC should also consider including messages and information on WIC with any SNAP information and application assistance efforts, including enrollment events.

6 Pursue strategies for improved food access and SNAP incentive programs that can increase availability of fresh and affordable foods and increase the value of SNAP benefits for purchases at SNAP authorized grocery stores.

7 Explore ways to better serve the homebound population in Houston through SNAP, taking into account special needs and considering coordination with other programs and organizations that currently provide food assistance and other services to the homebound.

III Business Processes

Build on recent improvements in business processes such as same-day service to enhance customer service and streamline SNAP administration.

1 Assess opportunities to update and implement customer service practices and norms across HHSC application assistance sites and call centers. This assessment should include procedures to ensure language and cultural access and proper application of income and deductions to support accurate eligibility decisions and calculate correct SNAP benefit amounts.

2 Provide trainings on SNAP eligibility requirements and the application process so that SNAP eligibility staff and community partners can help applicants properly navigate enrollment and recertification processes.

3 Create tools, available in print and online, that clearly illustrate the SNAP enrollment process in Houston for customers, stakeholders and staff, with a focus on required documentation and current HHSC workflow, policies, and procedures. Language should be simple, clear, and written at an appropriate literacy level. Special focus should be paid to the documentation required for the SNAP application process.

INTRODUCTION



Each year, Houston has over \$110 million of unclaimed SNAP benefits that could otherwise provide groceries for children, seniors and families who need help.

This is equivalent to a loss of nearly \$197 million to grocery stores, farmers and other local food retail suppliers. Down the road, this money also supports the food supply chain, including Texas farmers.

An increasing body of research shows that SNAP creates positive long-term outcomes around food insecurity, public health and economic development. However, in 2016 more than 1 out of 5 Houston residents who are eligible for SNAP were not enrolled. The recommendations outlined in this report are designed to reduce the Houston SNAP gap.

Lost Benefits, Lost Dollars^{3,4}

2016 BENEFITS AWARDED	\$979,841,468
ECONOMIC IMPACT GENERATED BY SNAP	\$1,753,916,228
2016 BENEFITS NOT AWARDED	\$110,028,411
LOST ECONOMIC IMPACT	\$196,950,856

On average in 2016, SNAP served 672,219 households in Houston, bringing in \$979,841,468 in 100% federally funded benefits, generating an estimated \$1,753,916,228 billion in economic activity. FRAC estimates that in 2016, more than 190,000 residents were likely eligible for SNAP but not participating.

HOW SNAP WORKS IN HOUSTON

SNAP is a shared federal/state partnership. Benefits are funded 100% by the federal government; administrative expenses are shared between USDA and Texas. Unlike a block-granted program, SNAP's federal structure allows it to respond to changes in need, whether due to economic downturns or natural disasters.

Federal eligibility rules provide income and resource limits on SNAP eligibility but allow states to apply for a variety of options and waivers to vary those rules. With regard to income limits, applicants' net incomes must be no higher than 100% of the federal poverty line. Most households also face asset limits and a gross income test (130% of the poverty line unless the state opts for a higher limit). Texas has opted to apply a \$5,000 limit on SNAP household assets with some vehicle values excluded.⁵ In Texas, the SNAP gross income test is 165% of poverty, which allows

the state to screen more applicants and determine whether their expenses for other basics like shelter and child care render their net incomes low enough to qualify them for SNAP benefits.

The Texas Health and Human Services Commission (HHSC) is the state's administering and operating agency, while the USDA's Food and Nutrition Service (FNS) Southwest Regional Office provides oversight and guidance to Texas and other states in the region. The USDA also provides funds to states for conducting SNAP outreach and application assistance (on a 50/50 federal/state reimbursement basis); implementing SNAP Education, known as SNAP-Ed (based on a federal formula basis); and offering SNAP Employment and Training, also known as SNAP E&T (on a 50/50 federal/state reimbursement basis as well as through a limited 100% federal allocation).

In addition to stimulating economic impact, based on SNAP research across the country, the positive impacts of closing the Houston SNAP gap include:

- Increasing food security for residents.
- Promoting better health outcomes and lowering health care costs.
- Ensuring lower-income students have direct certification for free school meals.⁶
- Helping seniors afford both food and medicine.
- Spurring demand for food retail stores, especially in underserved neighborhoods.
- Boosting local economic activity.

This report seeks to build on ongoing efforts by the Texas Health and Human Services Commission to take opportunities to modernize program administration and improve SNAP access and customer service with initiatives and best practices such as same day service, customer on-demand interviews, application assistance collaboration through the Community Partner Program, the Standard Medical Deduction, and D-SNAP, most recently to serve many of those impacted by Hurricane Harvey.

This report identifies specific pathways to increase SNAP enrollment in Houston through improving SNAP administration, outreach, enrollment and benefit redemption with the support and participation of a diverse group of stakeholders in food retail, hunger relief, health care, foundations and others.

"SNAP is one of the most effective tools for addressing hunger that we have in this country. It increases the purchasing power of eligible Texans to buy groceries and ensures that food is making its way into the household instead of sacrificing it to pay for other expenses. Additional collaboration can go a long way in ensuring that those who need it are able to utilize this resource."

— **Megan Hoag**,
Regional Director
of the Texas Hunger
Initiative at Houston
Regional Office,
Baylor University



SPOTLIGHT

Discussion of key factors for gaps in SNAP participation

The Houston SNAP Task Force identified a variety of barriers to higher participation in SNAP that included:

- Lack of information about benefits and how to apply.
- Stigma associated with public assistance.
- Difficulty of completing the application process, including submitting documents and completing an interview.
- Perception that household is over income threshold.
- Mobility issues.
- Concern that participation might undermine immigration status for someone in the household.
- Perception that benefit levels are too low to warrant applying.
- Getting cut off after enrollment for procedural reasons.
- Lack of proper screening for eligibility factors.
- Lack of language access and cultural competency.
- Misinformation about eligibility.
- Technology access.
- Customer service issues and difficulty navigating HHSC systems and offices.
- Lengthy hold times in phone systems.
- Lack of community outreach and education.
- Confusing agency notices and communication methods.
- Concerns about termination or reduction of benefits due to an increase in income from an employment status change (i.e. the cliff effect).

METHODOLOGY

The Houston SNAP Task Force was convened in 2018 to identify barriers to higher participation in SNAP among eligible people, and to create a set of policy recommendations for Houston. The convening partners, composed of Houston Food Bank, Food Research & Action Center and The Food Trust, invited members from the public, private and non-profit sectors, including community-based partners, health sector stakeholders, food retailers, the philanthropic sector, and individuals with experiential knowledge of hunger and SNAP. Convening partners sought a diverse group of stakeholders to have a comprehensive dialogue around SNAP participation challenges and solutions.

Over nine months, the Task Force met to discuss SNAP participation issues in three key categories: program policy, participant access, and application and business processes. In addition to meeting as a group, the convening partners hosted one-on-one conversations to give participating members opportunities to share their particular perspectives and roles regarding SNAP. Small group discussions helped identify group consensus for priorities to include in recommendations.

Convening partners and Task Force members sought the perspective of SNAP participants and others with lived experience of food insecurity. The Task Force deliberations were assisted by information gleaned from two focus groups of SNAP participants and other low-income people that the Houston Food Bank convened.

THE ROLE OF SNAP PARTICIPANTS

SNAP participants with lived experience of food insecurity and program access helped inform these recommendations. A SNAP participant on the Task Force provided important perspective. The Houston Food Bank also hosted two focus groups that elicited the views of low-income seniors and Latinos with lived experience of food insecurity. The focus groups facilitated discussion on the customer experiences applying for SNAP, program perceptions and barriers to participation. Feedback from those focus groups was reported to the Task Force and informed the final recommendations.

The following recommendations are a call for Houston's civic leaders to invest resources into an achievable, comprehensive plan that will elevate SNAP as a central strategy to eliminate hunger.

I Policy Recommendations

RECOMMENDATION 1: Help Eligible Seniors Obtain and Maintain SNAP Benefits

Streamline SNAP enrollment for eligible Houston seniors by a) enabling telephonic signatures for SNAP applications submitted by food banks participating in the Community Partner Program; and b) implementing an Elderly Simplified Application Project (ESAP) that shortens the application, creates a 36-month certification period, and provides for recertification without an interview for elderly participants with no earned income.

Telephonic Signatures

In Houston, despite online applications and telephone interviews being offered for SNAP applicants, current applicants must submit an ink signature, a step which can result in lengthy delays between application and benefit approval. A telephonic signature, or “spoken signature,” is a type of electronic signature that uses an individual's recorded verbal assent in place of an ink signature and which can be legally binding.

The 2008 Farm Bill gave states the option to accept spoken signatures for SNAP for the purpose of creating a more efficient and cost-effective application process for individuals and government agencies. Telephonic signatures can expedite access for individuals by eliminating the need for them to make an extra trip to the SNAP office or wait longer for benefits due to the time it takes for the mail to reach the SNAP agency and for that agency to process the paperwork. Telephonic signatures could be particularly important to improve access for low-income elderly Houstonians, many of whom have limited mobility and/or lack of transportation.⁷

Simplified Enrollment

Seniors often cite the difficulties in enrolling and recertifying eligibility for SNAP as main obstacles to their initial and ongoing participation. Barriers include an applicant's need to complete a lengthy, 28-page application form, supply a variety of documents to verify elements of eligibility, complete an interview, and then, after an initial certification period of 24 months or less, to repeat these steps.

The SNAP Elderly Simplified Application Project (ESAP) streamlines application and recertification procedures for senior households with no earned income. ESAP makes use of government data matches to verify information and reduce documentation burdens on clients, eliminates interview requirements at recertification, and extends certification periods up to 36 months. ESAP projects also accommodate a simplified application form, often only two pages. ESAP increases program participation among eligible seniors by making it easier for those households to navigate the SNAP application process and maintain their benefits over time. It reduces administrative burdens for both SNAP agencies and clients.^{8,9}

RECOMMENDATION 2: Help Houston Leverage Disaster SNAP Resources for Recovery

Conduct a post-Hurricane Harvey assessment of Disaster SNAP (D-SNAP) and SNAP, and apply lessons learned to improve disaster planning and recovery operations for Houston.

In a disaster's aftermath, people often have new and urgent needs for food and other assistance. This is particularly the case for low-income people who are less likely to have savings and other resources to draw on during such a difficult time. Advocates can work with federal and state partners to get temporary Disaster SNAP (D-SNAP) to households not in SNAP, and replacement and supplemental SNAP benefits to program participants adversely affected by the disaster. They can also work with their states on the annual SNAP Disaster Plan that each state submits to USDA by August 15 each year.¹⁰

In the wake of Hurricane Harvey in August 2017, Texas requested and USDA's FNS approved waivers to provide food assistance to Texans who had been adversely impacted by that storm, in Houston and surrounding areas. Two months of SNAP benefits at the maximum household allotment level were provided to those who applied at D-SNAP sites under slightly eased eligibility criteria; the same benefit levels were provided to existing SNAP households in Houston and loaded automatically onto their Lone Star Cards. Families were able to use SNAP benefits to purchase hot prepared food items at SNAP authorized retailers.

FNS also granted Texas HHSC waivers to ease SNAP administrative procedures to help SNAP agencies cope with the additional workload. For Texas as a whole, SNAP participation increased in September 2017 by 809,109 persons, compared with the pre-Hurricane Harvey month of August 2017.¹¹

As Houston assesses the efforts to provide emergency food assistance in the wake of Hurricane Harvey and plans for future disasters, it should consider:

- Including community and health care organizations and food retailers in pre-disaster planning.
- Creating a clear communications plan to notify organizations of important dates and policy decisions.
- Managing the transition period after D-SNAP, when many households may still need food assistance. D-SNAP award letters and other communication should include or refer to instructions to apply for regular SNAP.

For more information, see Feeding Texas' Texas Disaster Relief Action Plan.¹²

"SNAP participation has been associated with improvement in nutritional deficiencies and academic performance. Low-income families can obtain the food their children need to grow and thrive through this program. The food that the children receive is a building block they need to obtain their education which then can translate into financial security long-term."

— **Daphne Hernandez,**
Associate Professor
at the University of
Houston and Director
of the HOUSTON
Academy



SPOTLIGHT

RECOMMENDATION 3: Improving SNAP Benefit Distribution Schedules for SNAP Recipients and Retailers

Broaden the monthly SNAP benefit issuance cycle to better accommodate retailer operations under a transition plan that protects current SNAP clients from gaps in benefit receipt.

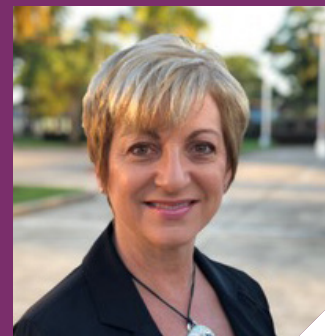
Monthly SNAP benefit distributions provide individual households with the means to purchase food at SNAP authorized food retailers. In Texas, those who participate in SNAP receive their benefits sometime within the first 15 days of the month. As a result, Texas retailers report that stores experience much heavier foot traffic and inventory demand in the first 15 days than they do later in the month. Supply chain planning becomes an issue, particularly for fresh and perishable items. Providing adequate hours for store employees throughout the month also is a challenge: more employees are needed at the beginning of the month to manage the high demand but fewer are required toward the end of the month when the demand is reduced. SNAP recipients are more prone to experience out-of-stock conditions and longer checkout lines during the first two weeks of the month.

Federal SNAP rules allow states to stagger SNAP monthly benefits for the caseload. For example, the distribution schedules for Florida, Alabama, and Delaware are 28 days, 23 days, and 22 days, respectively.¹³ In moving to a broader schedule, states should plan carefully to minimize any temporary interruption of benefits for clients during the transition to a new schedule. This entails considering how to reduce the time between prior and new issuance schedules for clients, taking into account input from retailers, SNAP clients and community serving agencies, and ensuring adequate notice to individual clients and other stakeholders.

Broader staggered issuance accommodates the needs of public/private partners and so facilitates mainstream benefit redemptions. By utilizing the regular rails of commerce—food retailer outlets and EBT systems—SNAP allows customers to purchase groceries with dignity in a manner and location similar to other Houstonians. The Task Force recommendation for a broader staggered issuance schedule for Texas assumes an appropriate transition plan that protects against any temporary loss of benefits that could increase food insecurity.

“We’re proud of the public-private partnership that allows SNAP to serve our customers efficiently and with dignity. We know that our customers may go through difficult times, whether due to economic downturn, personal issues, or a natural disaster. After Hurricane Harvey, Disaster SNAP brought critical resources that helped many Houston families during the recovery. Adopting best practices in SNAP remains important to Houston going forward, and representing Texas retailers by continuing our work with the SNAP Task Force, can only improve distribution of benefits to those who need it most.”

— **Kathy Sweidel-Caton**,
Vice President of
Communications of
Lewis Food Town,
Inc., and Food Council
Chairwoman of Texas
Retailers Association



SPOTLIGHT

RECOMMENDATION 1: Strategic Plan for Application Assistance to Address Houston SNAP Gap

Create a strategic plan to reach vulnerable populations with a neighborhood-based approach that is informed by perceptions and stigma around SNAP and demographic analysis of those who are SNAP eligible but not enrolled (EBNE), and that sets concrete goals to increase the enrollment rate of eligible Houston residents.

Closing the Houston SNAP gap includes serving eligible but not enrolled Houstonians where they are found—the neighborhoods in which they reside, the schools they attend, the places they work, the congregations where they worship, and the stores where they shop. It also means addressing their particular circumstances—their computer capacity, literacy level and language skills, mobility, and other individual factors and social determinants of health care that may affect access to and acceptance of public benefit programs. Assessing and meeting the needs of the diverse Houston EBNE population is fundamental in a city as diverse as Houston, where nearly 17 percent of Houstonians were born outside the U.S. and over a third speak a language other than English at home.¹⁴

A place-based approach using neighborhoods can identify neighborhoods with disproportionately low participation rates and create a geographically targeted strategy for SNAP application assistance in partnership with community organizations. A targeted approach can be paired with use of technology and other strategies that help serve particular population groups. For example, efforts to reach eligible people who are working or in-school might involve providing avenues through mobile technology and periodic out-stationing of application assisters in locations such as college campuses. Research on the demographics of EBNEs can help ensure that the HHSC's SNAP application assistance efforts in Houston are strategic, targeted and culturally competent.

COMMUNITY PARTNER PROGRAM

The Texas Health and Human Services Commission (HHSC) established the Community Partner Program in 2012 to collaborate with community organizations that can help Texans apply for and manage their food, cash, or health care assistance online.¹⁵ Community partners offer a computer that people can use to apply for benefits from YourTexasBenefits.com, and in some cases, Your Texas Benefits navigators who provide application assistance. As a result, Texans can get help applying for benefits from local organizations they know and trust. Community Partners are a diverse and growing array of organizations including faith-based organizations, emergency food providers, community health clinics and more. Through the collaboration, they gain access to regional support staff, information-sharing opportunities, and free training. Several members of the Task Force serve as community partners.

RECOMMENDATION 2: Create a SNAP Workgroup

Create a Houston SNAP work group that meets periodically to share best practices, discuss current SNAP policy issues, and get SNAP agency updates. This group would benefit from the participation of representatives from the Texas Health and Human Services Commission (HHSC), Harris County, and the City of Houston, as well as participation from groups including but not limited to SNAP clients, advocates, food retailers and stakeholders that serve seniors, immigrants, people with disabilities, veterans and military families, working families with children, and college students.

Houston has many dedicated, mission-based organizations who have unique knowledge of their focus populations and constituencies and who have an interest in improving and increasing participation in SNAP. Bringing these organizations together with policy and hunger advocates, SNAP experts, businesses, legislators and government agencies would foster ongoing collaboration, information-sharing and identification of common goals. In addition to disseminating information back to local communities and members, such convenings would elevate local experiences and priorities to inform statewide policies and practices.

Creating the Houston SNAP work group would take few additional resources but create significant opportunities for future capacity and progress. The Houston Food Bank is well positioned to convene Houston-based organizations on a regular basis, as its role in the Community Partner Program built trust and relationships over many years with state and local partners across Houston.

Promising Practice

In 2004, the Illinois Hunger Coalition, a statewide anti-hunger coalition, and Illinois Department of Human Services (IDHS) local offices established Community Quality Councils (CQCs).¹⁶ Since then, regular meetings convene participants such as community groups, direct service providers, food pantries, medical clinics, domestic violence shelters, and homeless advocacy organizations. The meetings have improved services at local offices and established collaborative relationships between local office staff, service providers, and community groups.



RECOMMENDATION 3: Identify a SNAP Agency Contact for External Partners

Designate an HHSC staff contact for external partner relationships to regularly communicate with more stakeholders about SNAP enrollment updates, HHSC policies and other announcements.

In Texas, SNAP is a state-administered program. The regional HHSC has been and will continue to be an essential communication channel for local communities and organizations. Designating a formal contact to explain program changes, answer questions around policies and practices, and be a general resource would help to strengthen the connection and create more efficient and accessible SNAP processes.

Currently a designated HHSC staff person serves as a key contact for those organizations that are formal members of the Community Partner Program. This model should be replicated with additional organizations that also provide SNAP application assistance or referrals, and would benefit from such an identified contact point. Understanding issues that organizations encounter when providing application assistance can help HHSC provide efficient resolutions for individual cases serviced by partners and that feedback, when aggregated across multiple cases, also can help inform HHSC about recurring issues that require more systemic change in policy or practice.

“Our partner organizations see over 200,000 people each year who are making the choice between food or housing and food or healthcare. As we work with families toward their overall financial stability, SNAP is a quick and effective temporary support for families in need, reducing food insecurity and freeing up resources for other basic needs. We will continue to support our partnerships in helping eligible families connect with SNAP.”

— Sharon Zachary,
CEO of Alliance
of Community
Assistance Ministries,
Inc. (ACAM)



SPOTLIGHT

RECOMMENDATION 4: Offer Employment and Training Services to Help SNAP Participants Move Forward

Use SNAP Employment and Training (E&T) funds more effectively and efficiently by screening SNAP clients to determine their job-related needs and barriers to employment and targeting E&T services to those most likely to benefit from that assistance.

SNAP is a nutrition program that also can offer participants other supports as they move up the employment and financial security ladder. Federal SNAP E&T funds are available to match state and local investments for employment and training, including for wrap-around services such as childcare and work uniforms.

SNAP E&T Programs often work with third-party workforce development organizations and institutions such as community colleges and other adult education programs. They often are well positioned to design and implement E&T services targeted to an individual's circumstances, skill gaps and career aims.

The current E&T approach has taken a one-size-fits-all approach to clients and relies on corrective enforcement measures which are often overly restrictive and do not account for an individual's need for help to re-enter the workforce. In addition, due to limited resources, the Texas E&T program has not been able to provide services to all of the SNAP recipients required to participate.

A tiered, targeted approach that screens clients for their individual situations and barriers to employment and assigns them to appropriate E&T activities or issues exemptions for those with non-removable barriers to employment offers a way to use E&T investments more efficiently and effectively.¹⁷

RECOMMENDATION 5: Improve Food Security and Health for Moms, Infants and Young Children Eligible for WIC and SNAP

Connect Community Partner Program participants with their local WIC sites to explore potential neighborhood-based partnerships and greater coordination efforts, such as SNAP outreach and application assistance at farmers markets located at WIC sites, or referral of WIC clients who have expressed food insecurity to local SNAP assistance sites. HHSC should also consider including messages and information on WIC with any SNAP information and application assistance efforts, including enrollment events.

The Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) supports supplemental foods, health care referrals and nutrition education for low-income pregnant women, new mothers, and children under the age of five who are nutritionally at risk. Households eligible for WIC may participate in both programs. However, in the average month in 2015 in Texas, only 55.4 percent of the total eligible population participated in WIC.¹⁸

Like SNAP, WIC is a federal nutritional assistance program, which has important impacts on food insecurity, and has been shown to improve diets, birth outcomes, measures of health, educational outcomes and economic self-sufficiency.¹⁹

In Houston, WIC is administered by the City of Houston, which manages WIC clinics as well as a number of farmers markets that operate on-site and accept SNAP EBT cards as a form of payment. Partnerships between Community Partner Program participants and their local WIC sites can increase enrollment and awareness of both programs.



RECOMMENDATION 6: Identify Opportunities for Increased Food Access and Affordability for SNAP Participants

Pursue strategies for improved food access and SNAP incentive programs that can increase availability of fresh and affordable foods and increase the value of SNAP benefits for purchases at farmers markets as well as at SNAP authorized grocery stores.

Access to healthy and affordable food is a barrier for too many Houstonians. In Harris County, about 315,000 residents live in neighborhoods without easy proximity to fresh food retailers.²⁰ Even with SNAP benefits, participants often face challenges in stretching their food budgets over the entire month. Indeed, federal SNAP benefits average approximately \$4 a person a day; Texas households receiving the minimum SNAP benefit get only \$15 a month.

SNAP can be leveraged to bolster food access and adequacy for low-income residents in Houston neighborhoods. One key approach that is supported through the federal Food Insecurity Nutrition Incentive (FINI) grant program is to partner on incentive programs through which SNAP shoppers get vouchers that help them purchase fresh and healthy foods. For example, a SNAP shopper might receive \$2 for every \$5 that shopper spends to purchase fresh foods from participating retailers. Such approaches have been shown to increase the purchase of fruits and vegetables from participating retailers.

Another approach targeted at elderly SNAP households has been implemented in New Mexico, Maryland and District of Columbia. Those governments use their own funds to supplement federal SNAP benefit levels to ensure a more adequate minimum amount for elderly households.

Promising Practice

In Tennessee and Mississippi, the AARP Foundation's Fresh Savings program is a healthy-food incentive program funded through a FINI grant. At participating Kroger grocery stores, for every \$10 spent on any SNAP eligible item, the consumer will receive a coupon for half off their next purchase of fruits and vegetables. There are also incentives offered at farmers markets. The program also offers a nutritional education component in the form of guided grocery store tours at participating Kroger stores.

"SNAP has been a lifeline not only for myself and my family but for many other families in my community. After experiencing food insecurity and its effect on a student's ability to succeed, I believe that it is crucial for everyone to have access to healthy and nutritious food choices especially those living on low to moderate incomes."

— **Jimmieka Mills,**
SNAP consultant



SPOTLIGHT

RECOMMENDATION 7: Explore Opportunities to Better Serve Homebound Houstonians

Explore ways for SNAP to better serve Houston's homebound population, taking into account special needs and opportunities for coordination with other programs and organizations that currently provide food assistance and other services to the homebound.

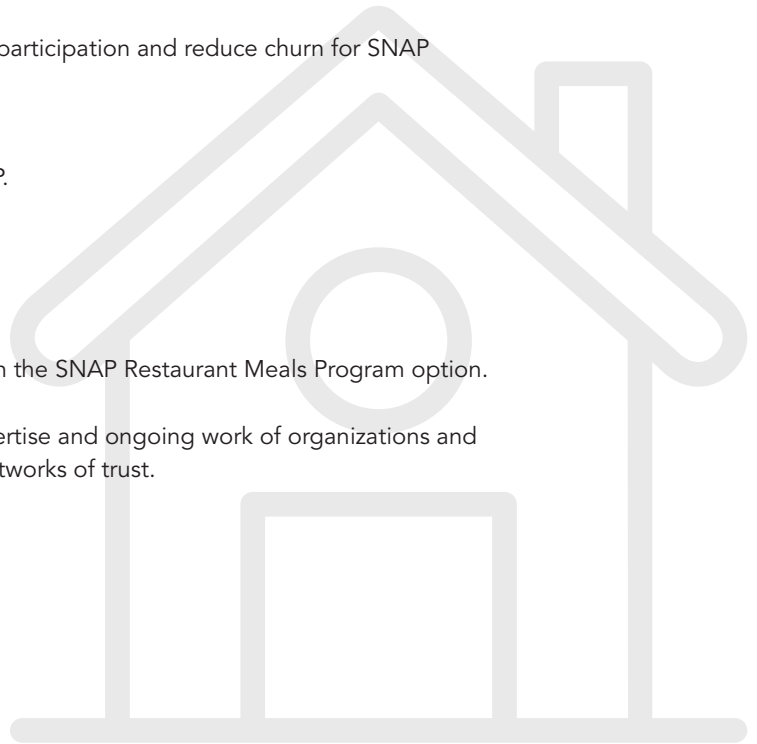
The SNAP application process can present special barriers to the homebound population. People with disabilities have food insecurity rates that are well above the national rate of 14.3 percent, and the added cost of medical expenses and special diets means that SNAP has particular value for this population. People with disabilities can have mobility and other issues that interfere with enrolling and staying enrolled in SNAP and that make purchasing and preparing meals at home difficult. Losing SNAP eligibility for procedural reasons, such as missed paperwork or interview during a certification period, rather than for financial ineligibility (caseload "churn"), can be more common for SNAP households with persons with disabilities.

The Task Force recognizes that there are some resources from which to learn and build in closing the SNAP gap for Houstonians with disabilities. In Texas, Meals on Wheels provides door-to-door delivery of specially designed meals to the homebound population and keeps records of each household's food needs. Coordination with such organizations to identify SNAP recipients who are homebound can increase access to information about special needs. Regular communication with Meals on Wheels and other such organizations can help increase awareness of SNAP, provide education around the application process and eligibility, and increase effectiveness of use of SNAP benefits in Houston and across the state.

Other strategies which have been proven to increase rates of participation and reduce churn for SNAP households that contain people with disabilities include:²¹

- Providing tailored materials and assistance.
- Streamlining processes to connect SSI recipients with SNAP.
- Taking special options and waivers.
- Lengthening of certification periods.
- Reducing reporting requirements.
- Providing greater access to prepared foods such as through the SNAP Restaurant Meals Program option.

Houston should implement innovations that leverage the expertise and ongoing work of organizations and programs that serve the homebound and have established networks of trust.



RECOMMENDATION 1: Continue to Modernize and Improve SNAP Customer Service

Assess opportunities to update and implement customer service practices and norms across HHSC application assistance sites and call centers. This assessment should include procedures to ensure language and cultural access and proper application of income and deductions to support accurate eligibility decisions and calculate correct SNAP benefit amounts.

HHSC has led important and significant initiatives to modernize and improve SNAP policies and business practices, including the Community Partner Program and the same-day service model. However, in many ways, applying for SNAP is still a difficult process. Often, eligible persons cannot complete the process without assistance or simply do not apply at all. Applicants face barriers that hinder their ability or desire to apply for SNAP. Furthermore, as clients are experiencing these barriers, the opportunities to communicate their concerns to the appropriate authority are often unclear.

HHSC can continue to build upon its recent progress by evaluating its own systems and processes. Research and development of systems for gathering input and evaluating the overall client experience would help to enable HHSC to track and measure progress towards goals that are client-centric and focus on enhancing customer service and successful client outcomes. In such an assessment, HHSC should strive to build a “Culture of Eligibility” with staff oriented toward using all tools available to connect eligible clients with the correct benefits and services.

As Houston has a significant percentage of immigrant and LEP populations, additional cultural sensitivity and language access training across all client-facing staff is recommended to enable quality access.

Texas Health and Human Services Commission’s (HHSC) mission is to improve the health, safety and well-being of Texans with good stewardship of public resources. Its programs assist families and children, seniors, and persons with disabilities with applying for various public services, including SNAP. HHSC leads the state’s efforts for application assistance, awareness campaigns, and efficiency of its systems and processes, making HHSC a fundamental stakeholder in SNAP’s improvement and overall success.

A high-performing SNAP is one that prioritizes the client experience and creates pathways to accessible enrollment while supporting department staff and community-based partners.

These recommendations acknowledge the leadership HHSC has shown to continually improve SNAP and also aligns with the needs of community-based direct service providers and those currently participating in SNAP or in process of applying for benefits.

RECOMMENDATION 2: Conduct SNAP Trainings for Eligibility Staff and Application Assisters

Provide trainings on SNAP eligibility requirements and the application process so that SNAP eligibility staff and community partners can help applicants properly navigate the enrollment and recertification processes.

Proper training on SNAP eligibility rules and use of deductions help ensure applicants are properly screened for eligibility and awarded correct benefit amounts. That in turn results in more efficient application processes and reduces administrative burdens for both clients and agencies.

Federal SNAP rules can be complex and subject to change or clarification. Regular trainings for eligibility staff and organizations are important to make sure those serving SNAP clients have the most up-to-date, accurate information. Given the special role that community partners perform in educating the community and performing application assistance, the information they disseminate through materials and on-one-one communications should be informed by such up-to-date training.

Low benefit levels are a common barrier to SNAP participation. Proper utilization of deductions such as the Dependent Care Deduction can help ensure that all allowed expenditures are taken into account, thereby providing SNAP households with the full correct amounts for which they qualify.

To increase awareness and participation, HHSC may consider developing and distributing materials that explain high-impact, underutilized SNAP deductions to eligible families and community service providers.

DEDUCTIONS

Full implementation of deductions helps seniors, children and working families receive the correct SNAP monthly benefit. The deduction from income means more adequate SNAP benefits, and SNAP enrollment rates for those who are eligible. Examples of high-impact, underutilized deductions include:

- **Uncapped dependent care deduction for child and adult dependents, including allowing for self-declaration of dependent care expenses.** Working families often incur substantial dependent care costs. In 2008, Congress eliminated the cap on dependent care deductions. Not only do families receive more adequate SNAP benefit levels, but the policy promotes work by helping families claim the true costs of dependent care rather than a capped portion.
- **Medical expense deduction.** Clients ages 60 and over and those with disabilities can deduct certain unreimbursed medical costs that they incur above \$35 in a month. Texas applies a Standard Medical Deduction, which reduces administrative burdens for clients and eligibility staff by allowing eligible clients who verify medical expenses above \$35 a month to receive a standardized deduction.

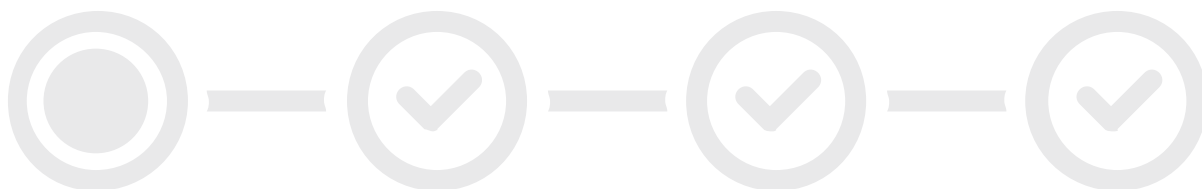
Ensuring effective implementation of deductions policies entails training eligibility staff to screen for deductions, increasing awareness of deductions' availability and impact, and streamlining verification processes to ease administrative burdens.

RECOMMENDATION 3: Help Make the Application Process Understandable

Create tools, available in print and online, that clearly illustrate the SNAP enrollment process in Houston for customers, stakeholders and staff, with a focus on required documentation and current HHSC workflow, policies, and procedures. Language should be simple, clear, and written at an appropriate literacy level. Special focus should be paid to the documentation required for the SNAP application process.

Lack of understanding of the SNAP enrollment process can be a major barrier to enrollment for potential SNAP participants. Members of the Task Force and SNAP participants frequently cited undue documentation requirements as a barrier to application completion, as they often entail additional appointments and office visits.

Tools that illustrate the SNAP enrollment process can help create a more efficient application process for both administrators and SNAP participants. They can give SNAP participants reasonable expectations about timelines and steps for enrollment. The tools should be distributed widely using HHSC and Community Partner communication channels and regularly updated to reflect changes in policies and practices.



MOVING FORWARD



SNAP is an effective way to help people purchase groceries for their families in times of need in Houston and across the country. Despite considerable progress, the current participation rate in SNAP demonstrates that there is still more work to be done in closing the Houston SNAP gap. This report identifies many of the barriers to enrollment, and it identifies specific strategies to move policies forward to eliminate those barriers.

As Houston continues to experience rapid population growth, SNAP is an important component of the city's neighborhood stabilization strategy and its ability to build a more inclusive city. If full participation of eligible persons were reached, Houston would receive an estimated \$110 million in additional federal nutrition benefits each year, and those benefits would generate an estimated \$197 million in additional economic activity per year. Increased participation would also lead to proven, positive impacts on food security, health and education.

Houston is well positioned to support the initiatives and policies identified in this report to lower barriers to accessing SNAP. There is already momentum surrounding this issue in Houston and Texas, and leaders in the civic, public, private, business and grocery sectors have all expressed the need for a multi-sector effort.

Now is the time to support local and state leadership in moving policies forward that can eliminate barriers to participation, reduce hunger, and improve community health. Together, we can ensure that all Houstonians have access to healthy, affordable food.

Now is the time to support local and state leadership in moving policies forward that can eliminate barriers to participation, reduce hunger, and improve community health. Together, we can ensure that all Houstonians have access to healthy, affordable food.

Endnotes

- 1 Food Research & Action Center analysis of data from the 5-year American Community Survey (2012–2016) and the 2016 Texas Homeland Security Profile and county-level administrative SNAP participation data from the Texas Department of Health and Human Services. Retrieved from <https://www.dhs.gov/profiles-legal-permanent-residents-2016-state> and <https://hhs.texas.gov/about-hhs/records-statistics/data-statistics/supplemental-nutritional-assistance-program-snap-statistics>
- 2 To calculate the value of additional federal benefits that would be received through SNAP if participation reached 100 percent of eligible individuals, this analysis uses a national estimate of the average monthly SNAP benefit for eligible individuals provided by the FRAC analysis of data previously cited.
- 3 Ibid.
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- 15 For more information about the Texas Community Partner Program and how to become a community partner, see <https://www.texascommunitypartnerprogram.com>
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FRAC

Food Research
& Action Center

Food Research & Action Center (FRAC) is the leading national nonprofit organization working to eradicate poverty-related hunger and undernutrition in the United States. Founded in 1970, FRAC provides coordination, training, technical assistance and support on nutrition and anti-poverty issues to a nationwide network of advocates, service providers, food banks, program administrators and participants and policymakers. To learn more about FRAC, visit www.frac.org.



The Food Trust
THEFOODTRUST.ORG

The Food Trust, founded in 1992, strives to make healthy food available to all. Working with neighborhoods, schools, grocers, farmers and policymakers, The Food Trust has developed a comprehensive approach that combines nutrition education and greater availability of affordable, healthy food. To learn more about The Food Trust, visit www.thefoodtrust.org.



Houston Food Bank is a solution to both hunger and food waste. In the year following Hurricane Harvey the Food Bank distributed 122 million nutritious meals through its network of 1,500 community partners, including food pantries, soup kitchens, social service providers, and schools in southeast Texas. Additional community services include nutrition education and SNAP application assistance.

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