

Gender and Racial Justice in SNAP

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Women, particularly women of color, women with disabilities, older women, LGBTQ individuals, and immigrant women, disproportionately face economic insecurity. In general, women of color face both gender and racial discrimination in hiring and wages. Women are overrepresented in the low-paid workforce and in sectors that are consistently devalued, such as domestic and care work. Overall, women make up 64 percent of the workforce in the 40 lowest paying jobs.¹ In addition to inadequate pay, these jobs often have unpredictable schedules and few worker protections, limiting access to vital benefits such as paid family and medical leave.² These long-standing structural inequities inhibit economic mobility for women, making them more susceptible to food insecurity.

The current COVID-19 pandemic has further exacerbated the gender and racial inequities in economic security for women and their families, and even more for women of color. The economic downturn resulting from the pandemic has been dubbed a “she-cession” as there has been a disparate job loss in sectors dominated by women, especially for women of color. Since February 2020, women have lost nearly 3.8 million jobs, accounting for 56 percent of all overall net job losses since the pandemic began.³ While there have been some gains in employment, 8.5 percent of Black women and 7.9 percent of Latinas ages 20 and older were unemployed in June 2021—over 1.6 times higher than their pre-pandemic unemployment rates.⁴ Furthermore, women of color make up a majority of what are now being considered essential workers.⁵

The Supplemental Nutrition Assistance Program (SNAP, formerly known as food stamps) is a critical program in providing women, children, and families with the food assistance needed to better support their wellbeing.

Prior to the pandemic, essential workers were nearly twice as likely to use SNAP.⁶ As millions of workers lost their source of income or had their hours reduced, workers needed SNAP to support themselves and their families during the height of the pandemic, and now as the economy slowly recovers. Black and Latina women were more likely than white, non-Hispanic men to report food insufficiency. In July 2020, Black, non-Hispanic women (21.5 percent) and Latinas (21.1 percent) were three times more likely than white, non-Hispanic men (7.0 percent) to report not having enough food in the prior week.⁷ As of May 2021, there has been a decrease, but high rates of food insufficiency persist for women of color. More than one in six Black, non-Hispanic women (17.1 percent) and Latinas (16.7 percent) reported not having enough food in the past week, compared to 5.7 percent of white, non-Hispanic men and 6.6 percent of white, non-Hispanic women.⁸

In Fiscal Year (FY) 2019, SNAP served more than 35.7 million people in 17.9 million households on average each month.⁹ This increased to more than 39.8 million people in 20.8 million households on average each month in FY 2020 (peaking at more than 43 million people in June 2020)¹⁰, as SNAP expanded to meet need during the economic downturn.¹¹ In January, February, and March 2021 (the only months for which data is available thus far for 2021), SNAP served more than 41 million people in 21 million households on average each month.¹² This shows the immense need for strong interventions to reduce food insecurity during the pandemic and subsequent recovery. However, even with its extensive reach and ability to serve more people as need increases, critical gaps still exist in the adequacy and administration of

SNAP for a multitude of women, especially women facing multiple forms of discrimination. As we seek an equitable recovery, we need to make sure SNAP can serve all women, children, and families whose circumstances make it hard to put food on their table.

SNAP Participation Rates for Women, Children, and Families

SNAP serves a diverse group of women, children, and families. The latest data on participation show that even prior to the pandemic, women, people of color, LGBTQ women, and people with disabilities were more likely to participate in SNAP:

- In FY 2019, women were more than six in ten (63 percent) of adult SNAP recipients.¹³
- In FY 2019, more than one in three (34 percent) non-elderly adult SNAP recipients was a woman of color.¹⁴
- In FY 2019, over six in ten (62 percent) of SNAP households with children were headed by a single adult, 92 percent of which were headed by women.¹⁵
- In 2019, 18 percent of LGBTQ women participated in SNAP, compared to 10 percent of non-LGBTQ women and six percent of non-LGBTQ men.¹⁶
- In 2015, SNAP served over 11 million people with disabilities.¹⁷
- SNAP serves over 17 million children, including 5 million children ages four or younger.¹⁸ Households with children make up 41 percent of all households receiving SNAP benefits.¹⁹
- In 2016, children were 11 percent of noncitizen recipients of SNAP, and women were almost 48 percent of noncitizen recipients of SNAP.²⁰

SNAP's Impacts on Women, Children, and Families

SNAP and Health

Food insecurity has a direct correlation with physical and mental health. SNAP helps families put food on their table, increasing participants' food security, and consequently, serves as a critical health intervention for women, children, and families.

- **SNAP promotes better nutrition, reducing the risk of diet-related diseases.** Food insecurity is linked to an increase in the prevalence and severity of diseases such as obesity, type 2 diabetes, heart disease, stroke, and some cancers.²¹
- **SNAP frees up money in family budgets to spend on medical costs and other necessary care.**²² Because of limited financial resources, those who are food insecure may attempt to stretch budgets by using strategies that can be harmful to their health, such as underusing or postponing medication because of cost,²³ postponing or forgoing preventive or needed medical care,²⁴ and forgoing the foods needed for special medical

diets (e.g., diabetic diets).²⁵ People of color forgo care and medications at a higher rate due to lack of affordability and under- or un-insurance.²⁶ Therefore, by providing SNAP, families have more room in their budgets to pay for prescriptions, premiums, copays, and other vital health expenditures.

- **Receiving SNAP can reduce stress levels and improve mental health.** As financial strain often manifests itself as physical stress, studies have shown that food insecurity increases the risk of depressive symptoms or diagnosis. This is especially dangerous for groups of women already facing a higher risk of depression, anxiety and stress, such as women who have been exposed to violence or substance use disorder, women at risk of experiencing homelessness, refugees, pregnant women, and mothers.²⁷
- **Obtaining food assistance benefits maternal and infant health.** Studies have demonstrated an association between food insecurity and complications of pregnancy, particularly second-trimester anemia, pregnancy-induced hypertension and gestational diabetes mellitus, and maternal pre-pregnancy weight, and gestational weight.²⁸ Additionally, higher food insecurity was associated with increased risk of birth defects, including cleft palate, spina bifida, and anencephaly.²⁹
- **Seniors, a population at high risk of experiencing chronic medical conditions, have had improved health outcomes while receiving SNAP.** Senior SNAP participants were found to be 5 percentage points less likely to cut back on their medications because of cost than eligible nonparticipants.³⁰ A longitudinal study of seniors with low incomes eligible for Medicaid and Medicare found that participation in SNAP reduced the incidence of two very costly types of care – hospitalization and long term care.³¹

SNAP and Education

Food assistance ensures that students in grades K-12 and college, including parenting students, do not have to focus on where their next meal is coming from more than their studies. Research shows that SNAP helps improve children's performance in elementary school and beyond.

- **For students in their critical years of development, SNAP can positively affect performance in school.** Children who experience hunger are seven times more likely than their counterparts to engage in physical altercations,³² likely due to negative changes in mood related to hunger.³³ Lower levels of self-control in early childhood resulting from hunger lead to higher levels of behavioral issues as they grow, compared to their food-secure peers.³⁴ Studies have shown that students participating in SNAP have lower rates of disciplinary issues in the earlier part of the month, compared to later in the month when SNAP benefits usually run out.³⁵

- **SNAP can help the modern college student.** Not all college students today are childless—many students, especially those in community college, are parenting students. Thirty-nine percent of parenting students, who are more likely to be women, receive SNAP.³⁶
- **SNAP's impacts on students in post-secondary school reach beyond hunger alleviation.** The benefits of receiving a college education are extensive, with each level of postsecondary education correlated to improved social and economic outcomes.³⁷ On almost every measure of economic well-being and career attainment, college graduates fare better than their peers with less education.³⁸ Therefore, by providing basic food assistance for students, SNAP also supports employment stability and wage growth.³⁹

SNAP and the Economy

SNAP is designed to expand as need increases. In September 2020, during the COVID-19 pandemic and recession, more than 42.9 million people received SNAP, a sizeable increase from the nearly 36.9 million people served in February 2020.⁴⁰ SNAP not only reduces food insecurity and aids the economic security of individuals, but also stimulates the economy as whole, in times of economic crisis.

- **SNAP helps mitigate the impacts of a recession.** During periods of high employment, SNAP serves as an automatic stabilizer, expanding to cover households as they become eligible and decreasing when the economy improves. As a part of the American Recovery and Reinvestment Act of 2009, a 13.6 percent increase⁴¹ in SNAP benefits helped augment food expenditures by 5.4 percent between 2008-2009 during the Great Recession.⁴²
- **SNAP helps the economy and businesses.** Studies estimate that \$1 of SNAP benefits generates between \$1.50 and \$1.80 in total economic activity during a recession.⁴³ In 2011, a total of \$71 billion was spent at SNAP authorized retailers, supporting small and mid-sized grocers.⁴⁴
- **SNAP is directly correlated with job creation and support.** Every \$10,000 of SNAP created 1.0 jobs in rural areas and 0.4 jobs in urban areas, compared to 0.2 pre-recession.⁴⁵ As recently as 2018, SNAP supported 782,600 jobs.⁴⁶

General Barriers to SNAP Eligibility and Access

Some statutory and administrative rules either purposefully or inadvertently make SNAP more difficult for eligible applicants and current recipients to access benefits. This reduces the ability for SNAP to help families with low incomes put food on their tables.

Gross Income Test

Generally, to be eligible for SNAP, households must have gross incomes at or below 130 percent of the federal poverty level (FPL).

For a family of four, this amounts to \$2,870 a month or \$34,450 a year.⁴⁷ Therefore, in order to be eligible to receive assistance, households must have extremely low incomes. However, states have some flexibilities with the gross income eligibility threshold.

- Broad-based categorical eligibility (BBCE) allows states to lift the income eligibility threshold up to 200% of the FPL and phase out benefits more gradually, rather than recipients immediately losing benefits by falling off the “benefit cliff”, while also simplifying the application process.
- Higher income guidelines are especially helpful for families in states with higher costs of living, including high child care, housing, and health costs that consume large portions of family budgets and leave little left for buying food.
- Despite this, only 18 states set the threshold at 200% of the FPL, while 17 states have the threshold set at 150% of the FPL or below.⁴⁸

Asset Limits

Currently, SNAP's eligibility criteria provide for a very low asset limit (\$2,250 for most families and individuals or \$3,500

for households with elderly or disabled members). This asset limit discourages families with low incomes from saving enough to make it through a financial emergency, such as a sudden loss of a job, a medical bill, or an unexpected car repair bill.⁴⁹ This inability to build a financial cushion especially harmed families when the COVID-19 recession hit.

- Today, 77 percent of low-to-moderate income U.S. households are asset poor—meaning their household lacks enough assets to provide subsistence at poverty level for three months, if their income were cut off.⁵⁰
- States using BBCE can help women and families build savings rather than penalize them for trying to build up the resources they need for economic self-sufficiency.
- Research has demonstrated that BBCE increases savings by families with low incomes. Households in states that utilize BBCE are eight percent more likely to have at least \$500 saved up, and five percent more likely to have a bank account.⁵¹
- While the vast majority of states (43) utilize BBCE to help families receiving SNAP build savings, three states only raise the asset limit to \$5,000, which does not provide much of a cushion in case of losing a job, and seven states do not use BBCE to raise the asset limit.⁵²

Lengthy and Complicated Application Processes

Extensive application processes and other burdensome administrative requirements can impose unnecessary barriers for people in need of nutrition assistance.

- Depending on the state, SNAP applications can range from 8-30 pages in length.⁵³
- Multiple verification documents may be required as well, as applicants must provide proof of identity, residence, immigration status, all forms of income and resources, and medical expenses for deduction (for those who are age 60 or older or have disabilities).⁵⁴ This presents difficulties for applicants with limited English proficiency, applicants with disabilities,⁵⁵ seniors, and survivors of gender-based violence.
- Additionally, recertification periods to continue benefits vary from as little as one month to two years.⁵⁶
- If households have a change in any of their initial application materials, they may have to provide additional paperwork to update their file and continue to receive benefits.⁵⁷

Time Limits

Federal law generally limits SNAP eligibility for non-exempt adults, without dependent children, age 18 through 49 to just three months out of every three years unless they obtain, maintain, and document an average of 20 hours a week of employment.⁵⁸ This provision denies people with low incomes food assistance when they most need it, and it does nothing to increase employment. Rather, harsh time limits shift the cost of providing food to states, cities, and local charities, which are less equipped to respond to a rise in need, and may result in higher rates of food insecurity among unemployed or under-employed individuals and their families.

- Prior to the COVID-19 pandemic, women faced structural barriers to consistently working (and reporting) 20 hours of work per week, such as overrepresentation in low-paid jobs with unpredictable schedules; discrimination and harassment at work, including retaliation, such as lost hours or job loss; and disproportionately bearing caregiving duties without paid family leave.⁵⁹

- During the COVID-19 recession, families have lost jobs and hours of work and may be struggling to meet SNAP's work reporting requirements. Unfortunately, high unemployment will likely last into 2021 and 2022, and the structural barriers to meeting these requirements for women and other groups facing discrimination may persist even as the overall unemployment rate goes down. The Families First Coronavirus Response Act ("Families First") temporarily suspended the underlying work reporting requirement until a month after the national emergency declaration is lifted.⁶⁰
- While states have some flexibilities to ameliorate the impact of the time limit, these do not fully address the structural issues that exist. It is also left up to states to request time limit waivers.

Insufficient Benefit Amounts

SNAP benefits allotments are calculated based on the Thrifty Food Plan, an outdated, inadequate measure of what it costs for households to maintain a nutritious diet.

The U.S. Department of Agriculture (USDA) created the weekly SNAP benefit allotments (called "market baskets") using national consumption data from 2001 to calculate actual consumption, food prices, and current dietary recommendations. Of the USDA's four basic food plans representing different cost levels, the minimal Thrifty Food Plan (TFP) is used for the SNAP allotments.⁶¹ However, the market baskets for TFP were based on reported consumption by low-income households, many of whom have inadequate diets because of resource constraints. Using the TFP unnecessarily limits households receiving SNAP benefits.⁶² Additionally, the current measure has not been revised since 2006 and adjusting the outdated measure for inflation is insufficient to adjust the benefit amounts to reflect current food prices.⁶³

The TFP has additional flaws, including:

- The TFP does not take into account the time cost to prepare meals; however, studies have found that the TFP may require households with low incomes to devote more time than they have available to make meals from scratch.⁶⁴
- In order to achieve the lowest cost possible, the TFP makes assumptions about dietary patterns that greatly deviate from actual consumption and do not adequately reflect the reality of how households eat.⁶⁵ For example, the weekly market basket for a family of four contains approximately 0.64 ounces of "frozen or refrigerated entrees" and 2.1 ounces of "all cheese." This translates to about two-thirds of a fish stick and two slices of cheese, for the whole family for a week.⁶⁶

- A 2018 report by the Urban Institute found that this shortfall is a widespread problem—the SNAP per meal benefit does not cover the cost of a low-cost meal in 99 percent of counties in the United States and Washington, DC.⁶⁷
- The TFP does not have enough food variety to align with federal dietary guidance, nor to address special dietary needs (e.g., for pregnant people). It also assumes SNAP participants can purchase most of the foods in the current market basket—a challenge for SNAP participants who lack much access to transportation and do not live or work close to stores offering fresh fruits and vegetables.
- Previous TFP adjustments have been cost-neutral, which unnecessarily constrains the total amount participants can receive each month to feed their families.
- In segregated neighborhoods especially, lack of transportation can hinder people from getting to public benefit offices to apply and comply with SNAP requirements, such as the time limit requirements.
- Households typically have a 45-day period for recertification, which is a small window of time for families with busy schedules.⁷⁴ If recertification requires an in-person office visit, parents without child care and/or paid leave may be at risk of losing SNAP because of their caregiving responsibilities.

COVID-19 Impact

As SNAP administrators had to shift to processing applications remotely and recipients sought food options that allowed them to remain safe during the pandemic, the USDA's waivers helped maintain operations while participation grew. COVID-19 has especially highlighted the need for changes to SNAP to ease use for families and individuals permanently, including:

- **Administrative requirements:** Flexibilities that were allowed to ease administrative burdens on state agencies during the pandemic indicate some of the requirements that create barriers for families, including:
 - o Certification periods and reporting requirements: Applicants usually provide paperwork and complete an interview at the end of their “certification period” to extend benefits. The waivers provided extended certification periods, and later as part of the October 2020 government funding law, allowed periodic report procedures instead of the more extensive recertification process.⁷⁵
 - o Interview requirements: States typically interview recipients at the time of application and then on an annual basis. More than 40 states utilized this waiver during spring 2020 that allowed them to skip interviews if programs verified applicant identification and households provided mandatory verification of income.⁷⁶ Despite this flexibility, there is evidence that some states continued to conduct targeted interviews for households by phone, video conference, or even in-person.⁷⁷
 - o Telephonic signature requirements: Prior to the pandemic, many states did not have technology to record an audio file of attestation by applicants. The waiver allows states to capture written documentation after verbal agreement from applicants over the phone instead. States reported that this waiver helped support virtual application processing during the pandemic and did not negatively impact program integrity.⁷⁸
 - o States can request extensions of operational flexibilities through December 2021 or a month after the end of the national public health emergency (whichever occurs first).⁷⁹

Congress authorized a 15 percent SNAP benefit increase for the first half of 2021, with President Biden later extending the increase through September 2021 as part of the American Rescue Plan.⁶⁸ While the national average cost per meal is \$3.09,⁶⁹ the average SNAP benefit for FY 2020 was about \$2.20 per meal per person.⁷⁰ This as an increase from the average SNAP benefit prior to the pandemic of \$1.44 per meal in FY 2019. While the benefit boost from Congress helped families get closer to national average cost per meal, it is still not sufficient. Therefore, even with the SNAP boost, families with low incomes are receiving less than three-fourths of the SNAP benefits they need to cover their meal costs. And millions of families still report not having enough food.⁷¹ Further, the USDA's June 2021 report regarding barriers that constrain the adequacy of SNAP allotments shows that current allotments are not sufficient for a healthy diet. Sixty-one percent of SNAP recipients reported affordability as the most common barrier to accessing healthy foods. A return to the status quo after the pandemic boost expires means that even more recipients will be unable to feed their families for the entire month, much less afford healthy food.

While the temporary COVID SNAP benefit boost from Congress provided families with some more assistance,⁷² it is important to improve the underlying SNAP allotment, especially because the economic recovery is uneven, with women of color and families with low incomes lagging behind. In March 2021, the Biden-Harris administration announced that the USDA would reassess the TFP calculation to better reflect a healthy basic diet.⁷³

Lack of Supports to Meet Eligibility and Program Requirements

The budgets of many women with low incomes, especially women of color, are further strained because they disproportionately lack access to affordable, high-quality child care, transportation, housing, and other family supports.

- **Prohibition against purchasing hot- and ready-made foods.** Currently, ready-made and hot foods are excluded from the types of foods that can be purchased with electronic benefit transfer (EBT) cards. Hot-and-ready meals not only help people spend less time in the grocery store amid COVID-19, but they may also provide participants with the greatest value for their benefits. While the USDA allows states to apply for waivers to avoid this limitation, only Washington, D.C. and Tennessee have the waiver.⁸⁰ Several states sought this waiver at the start of the pandemic, but their requests were denied by the USDA.⁸¹ The SNAP Restaurant Meal Program (RMP) is state-run and allows SNAP recipients who are elderly, experiencing homelessness, or have a disability to purchase food from authorized restaurants. Currently, only Arizona, California, Rhode Island, and Florida participate in RMP;⁸² however, more states are interested in requesting waivers but have faced barriers to participating.⁸³
- **SNAP online purchasing.** Prior to COVID-19, only seven states were approved to utilize EBT cards for online grocery purchases. At the onset of the pandemic, as more states took interest in participating in the online purchasing pilot, some states reported that it could take up to six months or longer to implement the program due to the way in which EBT funds are processed and the lack of capability that stores had to accept payment online.⁸⁴ This delay was particularly harmful to seniors and people with disabilities who are at an increased risk for contracting COVID-19 in places with large crowds. The slow start to state expansion forced nearly 10 percent of SNAP recipients to use their SNAP benefits in a store.⁸⁵ By late 2020, online purchasing rapidly expanded to 47 states, including D.C., giving 97 percent of SNAP recipients access to 20 national and independent authorized retailers.⁸⁶

Population-Specific Barriers to SNAP Eligibility and Access

Some SNAP administrative and legal requirements present specific barriers for populations that already face multiple forms of discrimination. This can make obtaining SNAP a difficult, and sometimes impossible, endeavor for populations that already experience economic insecurity at higher rates – and therefore especially need nutrition assistance.

Barriers for Black, Indigenous, and People of Color

Women of color are at the center of oppression in the United States and face unique challenges because of the compounded effects of various systems of power. Trauma stemming from historical race-based violence such as Native genocide and displacement, the enslavement of Black people, and the internment of Japanese citizens during World War II has undermined the trust women of color have in the federal government.⁸⁷

False race- and gender-based narratives have been used to demonize and shame women of color, especially Black women, for accessing public benefits – including SNAP. In an economic system that disadvantages women generally and especially women of color, the need for SNAP and other public benefits to meet everyday needs is inevitable.

- Contrary to these false narratives, most people accessing public benefits like SNAP do work, but are concentrated in jobs that lack robust protections for workers where employers pay low wages, provide few benefits, and offer unstable work schedules.
- Policymakers have used these false narratives to support a scarcity approach to funding public benefits, in an attempt to justify austerity and redirect funds in the budget toward corporations rather than people.
- Combined, the stigma of receiving public benefits and the use of false narratives to justify underfunding have further discouraged eligible recipients from applying for public benefits.
- The prohibition against using benefits from the Food Distribution on Indian Reservations (FDPIR) and SNAP during the same month forces Indigenous households to choose which set of inadequate benefits to utilize – rather than providing an added layer of needed support.⁸⁸
- Indigenous communities have long been stripped of food sovereignty due to forced displacement by the government.
 - o Federal programs like SNAP and FDPIR reduce tribal self-governance because tribal leaders are usually excluded from federal decision-making about nutrition assistance.
 - o This prevents tribes from administering the program in ways that meet the unique needs of their communities.
- In addition, lack of trust in the government within communities of color because of historic and present-day systemic racism can discourage eligible households from applying for SNAP.

Barriers for Undocumented and Immigrant Families

On top of facing barriers to work due to citizenship status and racial discrimination in the job market and workplace, undocumented and immigrant families are often excluded from federal programs such as SNAP. Even when eligible, immigrant and undocumented families may be unable to access these federal programs due to inadequate outreach.

- The Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA) created two categories of immigrants for purposes of determining public benefit eligibility. “Qualified immigrants” include refugees, lawful permanent residents (LPRs), and some other protected immigrant statuses.⁸⁹ “Non-qualified immigrants” include students and tourists, immigrants with temporary protected status, asylum applicants, and undocumented immigrants⁹⁰ and are generally ineligible for federal public benefits, including SNAP.⁹¹
- Qualified immigrants, excluding children, face a 5-year waiting period before receiving public benefits.⁹²
- SNAP applications vary state by state, so depending on the capacity of the state agency, applications may not be available in a multitude of languages. Lack of state funding or capacity for translation services and outreach to immigrant households restricts the amount of people that know they are eligible, or that can apply even if eligible.

Barriers for Formerly Incarcerated Individuals

Incarcerated individuals and their families face health, economic, and social obstacles both during their incarceration and after they are released. Access to programs like SNAP provides support as reentering individuals regain their footing; however, PRWORA drastically reduced access to these programs for formerly incarcerated people.⁹³

- For people who were convicted of a drug felony:
 - Guam and South Carolina still impose a lifetime ban on receiving SNAP and TANF, rendering thousands of people ineligible to receive benefits.⁹⁴
 - Many states restrict SNAP eligibility, such as by requiring drug testing or participation in a drug treatment program.⁹⁵ These requirements can create unnecessary financial barriers for people who are already experiencing economic hardship and may not be feasible for families with caregiving responsibilities.

- Some states may opt to impose a two-year temporary disqualification period for people who violate parole.⁹⁶ This modification is especially harmful to people of color, as over-policing and underfunding of Black and brown communities makes them more susceptible to recidivism.

Barriers for LGBTQ people

Despite survey evidence that shows higher poverty rates for LGBTQ individuals, government poverty and hunger data often do not capture sexual orientation and gender identity. Surveys conducted by non-profits and academics often are not administered as frequently as government data is updated.⁹⁷

This data discrepancy makes it harder to detect underlying gaps that exist in SNAP eligibility and benefits for the LGBTQ community. Additionally, **LGBTQ people are susceptible to discrimination in both the application process and during benefit use, creating unique challenges.**

- Transgender people, particularly trans people of color and trans people experiencing poverty and/or homelessness, participate in informal economies (e.g., sex work) at higher rates.⁹⁸ Stigma associated with these jobs can discourage individuals from applying for federal programs such as SNAP, which may entail reporting such income.⁹⁹
- Lack of antibias training among government employees leads to microaggressions or discrimination, discouraging LGBTQ individuals from interacting with state agencies and utilizing them as a resource.¹⁰⁰ In-person interviews can be onerous and may put LGBTQ people at risk of gender-disaffirming and anti-LGBTQ conversations with staff who have not been adequately trained.
- The patchwork of state rules around gender identity and changing official government IDs, particularly in states that require gender affirmation/confirmation surgeries first, can create difficulties for transgender and gender-nonbinary people to have IDs that match their gender identity. LGBTQ women and nonbinary/genderqueer individuals face higher rates of discrimination in getting accurate IDs than LGBTQ men,¹⁰¹ and 467,000 transgender adults in the U.S. do not have an ID with the correct gender marker.¹⁰² Without accurate documentation, trans and gender-nonbinary people may have difficulty applying for SNAP.

- Even if an application is approved, identification requirements may also present barriers for LGBTQ people. While most states only require a pin number for security purposes, two states, Massachusetts and Missouri, require that photo identification be included on EBT cards.¹⁰³ This may exacerbate or revive gender dysphoria and make recipients susceptible to discrimination at retailers in the event that their gender markers do not reflect their gender identity.
- DV/SA survivors may face challenges obtaining and maintaining 20 hours of employment per week because of abuse, instability in child care for noncustodial children or housing, or needing to take time off work to attend court hearings, which would make it harder to meet work reporting requirements.
- Survivors have also reported dissatisfaction in screening and referrals to resources, including, but not limited to:¹¹⁰
 - Inconsistent/non-existent screening for DV/SA during the application process;
 - Lack of screening for disability and other work barriers for DV/SA survivors;
 - Lack of referrals to job or employment services; and
 - Dependent care and child support deductions not being used to the best extent in benefit amount determinations.

Barriers for Survivors of Domestic Violence and Sexual Assault

Women living in poverty experience domestic violence at twice the rate of those who do not, and the violence perpetrated against them can make it impossible to climb out of poverty.¹⁰⁴ Women who have experienced food insecurity in a 12-month period also face higher prevalence of stalking and physical violence from a partner compared to women who do not.¹⁰⁵ **Survivor advocates agree:**

SNAP helps survivors of domestic violence establish their safety and stability.¹⁰⁶

- Survivors attempting to leave an abuser have reported administrative issues that prolong periods of food insecurity such as:¹⁰⁷
 - Trouble separating cases where both the abuser and survivor were receiving SNAP in the same household in a timely manner;
 - Challenges qualifying for emergency or expedited SNAP when domestic violence and sexual assault (DV/SA) is indicated; and
 - Delays in receiving EBT cards.
- In order to exercise control over their partners, abusers often actively prevent their partner from attaining economic independence by sabotaging their partner’s economic stability. For example, an abuser may impede a survivor’s access to financial resources, housing, child care, or health care; interfere with their education or employment; engage in reproductive coercion; ruin the survivor’s credit; leave the survivor with tax debt; and more.
 - These forms of abuse can make it hard for survivors to provide the documents they need for verification in the application process.¹⁰⁸ Survivors may also be asked to provide documentation identifying themselves as a survivor of DV/SA, including protection orders, court documents, police reports, etc., which may subject survivors to more trauma at the hands of the police or other state employees.¹⁰⁹ If survivors cannot obtain the required documents on their own, they may need to come back in contact with their abuser in order to obtain legal documents, subjecting them to further abuse.

Barriers for People With Disabilities

People with disabilities are twice as likely to live in poverty and face food insecurity.¹¹¹ **Too often, people with disabilities face discrimination in employment as well as misconceptions about their ability to work.**¹¹² In addition, disabled people may need additional supports and services to obtain and keep jobs, which are often difficult to access because of insufficient accommodations policies. In 2020, 17.9 percent of disabled people were employed—a decrease from the 19.3 percent of disabled people employed in 2019 prior to the pandemic, and much lower than the 61.8 percent of non-disabled people who were employed in 2020.¹¹³ The unemployment rate for disabled people increased to 12.6 percent in 2020, compared to the 7.9 percent unemployment rate for non-disabled people.¹¹⁴

- SNAP’s time limits harm many working-age adults, including people with disabilities.
 - Many people with disabilities can work but are unable to meet the 20 hours per week work reporting requirements because of employment discrimination, including lack of accommodations. So they may lose access to SNAP after three months through no fault of their own.
 - Some people with disabilities cannot work, but their SNAP offices do not help them with the exemption process from SNAP time’s limit and so they lose their benefits.
- To qualify for SNAP’s exceptions for people with disabilities, such as the higher asset limit, people with disabilities must receive Supplemental Security Income (SSI), Social Security Disability Insurance (SSDI), or other disability benefits.¹¹⁵ Many people with disabilities have applied for such benefits, but have been waiting months or years for their applications to be accepted. Other disabled people do not meet the strict

eligibility requirements for SSI or SSDI, yet face economic insecurity and would benefit from SNAP's exceptions for people with disabilities. Further, the USDA's narrow definition of "disability" fails to count many people with disabilities from its participation statistics reporting.

Barriers for Older Adults

Older women have higher poverty rates,¹¹⁶ are more likely to live alone,¹¹⁷ and are more likely to be food insecure than older men.¹¹⁸

Eligible older adults have historically participated in SNAP at very low rates, even pre-pandemic.¹¹⁹ Additionally, adults age 50-64 who don't yet receive Medicare, Social Security, or other public benefits for seniors have the highest rates of food insecurity for older adults.¹²⁰

- Older adults age 50-59 are not exempt from time limits yet may face challenges in finding and keeping employment, especially during tight job markets, because of age-based discrimination. For example, in May 2021, 124,000 fewer Black women¹²¹ and 64,000 fewer Latinas¹²² ages 55 and older were in the labor force compared to February 2020. And over a million more people than expected retired between March 2020 and June 2021, likely including some who retired early.¹²³
- Despite being more likely to live on fixed incomes, many older adults only get the minimum weekly SNAP benefit of \$16. It is virtually impossible to meet complex dietary needs, including special diets based on medical conditions, on the minimum benefit amount.
 - Adults over 60 are eligible for higher SNAP benefits by deducting their medical expenses. However, many are not aware of this option.¹²⁴
 - Even when they are aware, finding physical documentation of expenses can be burdensome, especially for older adults with mobility difficulties and cognitive decline.
- States can opt to participate in the Elderly Simplified Application Project (ESAP), a demonstration project designed to streamline enrollment in SNAP for seniors with very low incomes. However, only eight states participate in ESAP.¹²⁵

Barriers for Young People and College Students

Young people and college students are one of the fastest growing food insecure populations. A report from the Government Accountability Office (GAO) found that 71 percent of undergraduate students now have at least one characteristic that complicates their ability to attend classes, such as being financially independent.¹²⁶ When students have to support themselves, they risk lower retention and graduation rates compared to their "traditional" counterparts. More robust and diverse supports can help mitigate that risk. Unfortunately, nationwide, **82 percent of college students**

who qualify for SNAP benefits do not receive them, translating to an average of \$1,500 in missed food assistance a year per student.¹²⁷

- Most college students are not eligible for SNAP unless they work twenty hours per week or receive a federal work study grant. This is despite a reported 39 percent of all undergraduate students having a household income at or below 130 percent of the federal poverty line,¹²⁸ which would allow them to receive SNAP benefits as a member of a SNAP-eligible family. Additionally, about half of low-income students *also* work at least twenty hours per week, and thus meet both eligibility requirements.¹²⁹
- Due to lack of outreach on college campuses, many students aren't even aware that SNAP is an option for them. Thirty-one percent of students at four-year colleges and 24 percent of two-year college students have not heard of campus supports available for help obtaining SNAP.¹³⁰
- Low-income students, especially those who live on college campuses and don't have transportation to travel to larger grocery stores and supermarkets, may lack access to retailers that accept SNAP.
- The 2021 Consolidated Appropriations Act, in response to the COVID-19 pandemic, temporarily expands eligibility for college students who meet one of two new exemptions. This includes students who are determined by their higher education institution to be eligible to participate in state or federally financed work study or students with an Expected Family Contribution (EFC) of \$0 for the current academic year.¹³¹

Recommendations

Advocates and policymakers can overcome these persisting barriers and improve SNAP so no person goes hungry. Such improvements include:

- **Expanding eligibility to reach more families struggling to put food on their table**, such as by creating a more accurate measure of poverty and removing all eligibility limitations for formerly incarcerated people, immigrants, college students, and Indigenous people.
- **Increasing benefits so they last the full month**, such as by shifting from the Thrifty Food Plan to the Low Cost Food Plan, permanently boosting the minimum and maximum monthly benefits, establishing standardized excess medical deductions¹³² for older adults and people with disabilities, and considering additional changes to the benefit calculation method to better acknowledge hefty child care, housing, and medical expenses.
- **Improving application processes**, such as by permanently adopting administrative flexibilities allowed by the Families First Coronavirus Response Act, implementing the Elderly Simplified

Application Project nationwide, modernizing SNAP platforms in all states to include online applications and recertifications, and improving training to screen for DV/SA and the exemptions and extensions available to survivors. Promote timely access to benefits for individuals who are leaving incarceration by accepting applications, completing phone interviews, and accessing their EBT cards prior to release.¹³³

- **Improving outreach efforts**, such as by increasing language and interpreting services for non-native English speakers and people with disabilities; funding and improving targeted messaging for LGBTQ individuals, immigrant families, and young people, especially college students; and aligning information collected through financial aid offices to connect potentially eligible students.
- **Increasing race and gender justice** by giving more autonomy for Tribes and facilitating better inclusion of Tribal, Black, and Latinx communities in the policymaking process; discontinuing the state option to require photos on EBT cards and simplifying the process for changing names on cards to prevent discrimination on the basis of gender identity; and ensuring SNAP benefit administrators participate in anti-bias training.
- **Improving data collection on SNAP participation** by allowing people to self-identify as having a disability and adding sexual orientation and gender identity voluntary demographic questions to better understand food insecurity and SNAP participation rates.¹³⁴

Conclusion

SNAP is integral to the economic security and well-being of women, children, and families – especially those facing multiple forms of discrimination. SNAP improves health, employment, and educational outcomes for individual families while supporting the economy as a whole. As the nation slowly, and unevenly, recovers from the COVID-19 recession, It is imperative to increase SNAP benefits and streamline eligibility and access so that all women and families can put food on the table.

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