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Gender and Racial Justice in SNAP

National Women's Law Center | Food Research & Action Center

Women, particularly women of color, women with disabilities, older women, immigrant women, and LGBTQIA+ individuals, disproportionately face economic insecurity. In general, many experience both gender and racial discrimination in many aspects of their lives, and that hinders their ability to make ends meet.¹ Women are overrepresented in the low-paid workforce² and face persistent wage gaps, which are even larger for women of color.3 Women also shoulder a disproportionate share of unpaid family caregiving throughout their lives, which also reduces their earnings. 4 These and other long-standing structural inequities undermine economic security for women, especially women of color, making them more susceptible to poverty⁵ and food insecurity.⁶

The COVID-19 pandemic further exacerbated the economic insecurity for women, especially women of color, and their families. The economic downturn was even dubbed a "she-cession" for its disproportionate impact on women, and especially for women of color.7 Millions of women and their families struggled to meet basic needs during the pandemic.8 Along with other pandemic relief, Congress expanded SNAP benefits, which expired in March 2023.9

Women, especially women of color, continue to face rising costs, systemic inequities, and the lasting effects of the pandemic, and many are struggling to feed themselves and their families. Millions of people still struggle to put food on the table, and high rates of food insecurity have disproportionately hit Black and Latinx women.

The Supplemental Nutrition Assistance Program (SNAP, formerly known as food stamps) is a critical program that provides people with low incomes, including women, LGBTQIA+ people, and their families with essential food assistance. SNAP helps ensure that women and LGBTQIA+ people can meet their basic needs and supports their well-being. But while SNAP plays a crucial role in alleviating food insufficiency for women and families, currently, there are barriers that prevent food-insecure women, especially those facing multiple forms of discrimination, from fully accessing and benefiting from SNAP. Rather than cut SNAP, as some policymakers have persistently sought to do in recent years, 10 we have to make sure SNAP can serve all whose circumstances make it hard to put food on their table.

Women, People of Color, LGBTQIA+ People, and People with Disabilities Have Higher SNAP Participation Rates

In December 2023, more than 41.1 million people received SNAP,¹¹ demonstrating the continued need for nutrition assistance. Recent data on participation show that women, people of color, LGBTQIA+ people, and people with disabilities were more likely to participate in SNAP.

- Women were more than half (55.4 percent) of non-elderly adult SNAP recipients in 2022.
- About one in three (33.0 percent) non-elderly adult SNAP recipients was a woman of color in 2022.¹³
- In 2022, over five in 10 (53 percent) of SNAP households with children were headed by a single adult.¹⁴
- In 2020, 20 percent of LGBTQIA+ women participated in SNAP, and 28 percent of nonbinary/genderqueer individuals reported that they, their partner, or their children received SNAP benefits in the past year.¹⁵
- SNAP helps nearly 4 million nonelderly adults who either receive disability benefits or have work-limiting health conditions.¹⁶

In 2022, SNAP moved nearly 3.7 million people, nearly 1 million more people than in 2021, out of poverty as measured by the Supplemental Poverty Measure, including 1.3 million women (339,000 of whom are Black, 308,000 of whom are Latina, 68,000 of whom are Asian, and 548,000 of whom are White, non-Hispanic).¹⁷

SNAP Improves Health and Education Outcomes While Also Boosting the Economy

SNAP and Health

- SNAP promotes better nutrition, especially in its current, unrestricted form.¹⁸ Those who are eligible for SNAP and do not participate are more likely to struggle with diabetes, asthma, and other chronic conditions.¹⁹
- SNAP is associated with improved long-term health, especially maternal health. Studies have shown that SNAP participants are more likely to report excellent or very good health than nonparticipants with low incomes. Early access to SNAP among pregnant mothers and in early childhood improved birth outcomes and long-term health as adults.²⁰

- SNAP is linked with better access to preventive health care and reduced health care costs. 21 Studies have shown that infants and children in families that receive SNAP are more likely to see a doctor for periodic checkups. 22 In addition, adults with low incomes participating in SNAP incur nearly 25 percent less in medical care costs in a year than nonparticipants with low income. 23 Modest increases in SNAP benefits in some areas have significantly slowed the cost growth of Medicaid for individuals with chronic conditions, 24 underscoring the importance of prevention in reducing health care costs and improving health outcomes.
- SNAP frees up additional resources that can be used on medical costs and care. 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, 25 forgoing the foods needed for special medical diets (e.g., diabetic diets), or postponing or forgoing preventive or needed medical care. 26 Receiving SNAP can alleviate pressure on family budgets and make it easier to meet health-related costs.
- Receiving SNAP can reduce stress levels and improve mental health. Studies have shown that experiencing food insecurity is associated with an increased likelihood of psychological distress, depression, anxiety, and severe mental illness.²⁷ Among families with lowincome with young children, food insecurity was found to coincide with maternal depression and domestic violence.²⁸ Ultimately, uncertainty about the ability to afford enough food may result in feelings of anxiety, stress, and shame that negatively impact one's mental health.²⁹

SNAP and Education

- 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, 30 likely due to negative changes in mood related to hunger. 31 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. 32
- SNAP can help support college students. Millions
 of undergraduate students report experiencing food
 insecurity.³³ Though not all college students are eligible
 for SNAP, 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.³⁴

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SNAP and the Economy

Asset Limits

• SNAP not only reduces food insecurity and increases economic security for people and their families, but the program also stimulates the economy as whole. SNAP benefits are one of the fastest, most effective forms of economic stimulus during recessions. For every \$5 in SNAP benefits spent at local grocery stores or farm stands, \$9 in economic activity is generated for the surrounding community.³⁵ It is also estimated that every \$1 billion in SNAP benefits generates about 15,000 full-time equivalent jobs during an economic downturn.³⁶

Some SNAP Rules Make It Harder for Women and Families with Low Incomes to Put Food on the Table

Some statutory and administrative rules make it more difficult for eligible applicants and current recipients to access SNAP benefits.

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).³⁷ For a family of four, 130 percent of the poverty line translates to \$3,250 in income per month, or about \$39,000 a year.³⁸ Therefore, to be eligible for assistance, households must have extremely low incomes. However, states can adopt a policy—broad-based categorical eligibility (BBCE)—that provides some flexibilities with the gross income eligibility threshold.

- BBCE allows states to lift the income eligibility
 threshold up to 200 percent of the FPL and phase out
 benefits more gradually, rather than having recipients
 immediately lose benefits when their income exceeds a
 certain amount (known as the "benefit cliff"). BBCE also
 simplifies the application process.
- Higher income thresholds 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 25 states applying BBCE set the threshold at 200 percent of the FPL, while nine BBCE states have the threshold set at 150 percent of the FPL or below.³⁹

Currently, households without a member age 60 or older or who has a disability cannot have assets over \$2,750, and households with such a member cannot have assets over \$4,250.⁴⁰ Asset limits tend to discourage savings and leave families with low incomes more vulnerable to financial emergencies, such as the sudden loss of a job or an unexpected medical bill.⁴¹ They can also force some of those families to choose between owning a critical asset, such as a vehicle they need to get to work, and receiving the SNAP benefits they need to put food on the table.⁴²

- Seventy-seven 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.⁴³
- States using BBCE can raise the asset limit, which helps 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 8 percent more likely to have at least \$500 saved up, and 5 percent more likely to have a bank account.⁴⁴
- While most states (44) use BBCE to help families receiving SNAP build savings, three of those states only raise the asset limit to \$5,000, which does not provide much of a financial cushion. Seven states do not use BBCE to raise the asset limit.⁴⁵

Inefficient and Complicated Application Processes

Burdensome administrative requirements can impose unnecessary barriers for people in need of nutrition assistance.

- Applicants must provide proof of identity, residence, and immigration status, as well as all forms of income and resources. This can present difficulties for applicants with limited English proficiency, applicants with disabilities,⁴⁶ seniors, and survivors of genderbased violence.
- If recertification of eligibility 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.

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- Frequent recertification or in-person interviews can require applicants to miss work, which may cause them to lose employment-related income or lose potential SNAP benefits.
- In addition, inefficient or underfunded administrative agencies can create barriers for families in need of SNAP. In Tennessee alone this year, 20,000 applications older than 30 days are still pending after the installation of a new system to process applications at the state's Department of Human Services.⁴⁷ These excessive wait times hugely impact people in need of nutrition assistance.

Time Limits

Under current law, most individuals without disabilities ages 18 to 52 without children in their homes can only receive SNAP benefits for three months in a three-year period unless they obtain, maintain, and document an average of 20 hours a week of employment. (The upper age limit will increase to 54 in October 2024). (The upper age limit will increase to 54 in October 2024). (This provision denies people with low incomes food assistance when they most need it, and it does nothing to increase employment. Rather, studies have shown that time limits operate to take away SNAP benefits, particularly from women, people of color, LGBTQIA+ people, and people with disabilities. (To example, the time limit extended by legislation in June 2023 alone will cause almost 750,000 older adults to go hungry once it is fully phased in. (1)

- Time limits are outdated and rooted in racist stereotypes about many SNAP recipients. They also do not have any meaningful effect on labor supply as the overwhelming majority of people subject to time limits are already working. 52 SNAP participation is not a cause but a symptom of a labor market that lacks enough jobs with "full-time hours and wages to provide sufficient family sustaining incomes." 53
- It is challenging for many unemployed or underemployed workers to meet SNAP's current time limits. Women are overrepresented in the lowwage workforce, which is plagued by unstable and unpredictable work schedules, nonstandard hours, part-time work, and few benefits like paid sick leave.⁵⁴
 Women are also more likely to face discrimination and harassment at work, which can result in lost hours or job loss.⁵⁵

- Harsh time limits also shift the cost of providing food assistance to states, cities, and local charities, which are less well-equipped to respond to a rise in need. This may result in higher rates of food insecurity among unemployed or under-employed individuals and their families.
- While states have some flexibilities to ameliorate the impact of time limits,⁵⁶ these do not fully address the structural issues that make it harder for people to meet these requirements. It is also left up to states to request time limit waivers.

Insufficient Benefit Amounts

The maximum amount of SNAP benefits that eligible individuals or families receive as a fixed amount every month during a specified period is calculated by the Thrifty Food Plan (TFP)—the cheapest of four food plans developed by the U.S. Department of Agriculture (USDA)—to calculate the lowest cost amount to have a nutritious diet.⁵⁷ In 2021, the USDA modernized the plan for the first time in more than 45 years to reflect current food prices and nutritional guidance.⁵⁸ It's clear that the long-overdue update to the TFP has played a crucial role in mitigating food insecurity.⁵⁹

Despite this, the TFP still has some flaws, including:

- The TFP does not accommodate specific dietary needs.⁶⁰ For example, it does not account for the additional needs of pregnant or breastfeeding people, persons engaging in heavy physical labor, people with disabilities who have dietary restrictions, or people with severe food allergies who struggle to afford allergenfree food —which is typically priced higher— with inadequate SNAP benefits.⁶¹
- Many people who live in areas with food access issues
 encounter disproportionately high prices that prevent
 them from getting an adequate amount of food under
 the TFP. In addition, obtaining an adequate diet with the
 TFP is challenging because of the minimal availability
 of stores offering foods to fill a TFP market basket—
 particularly in rural America where food insecurity is the
 highest.
- Meeting the TFP guidelines can be especially challenging for households in low-income communities without access to a vehicle.⁶² In addition, transportation costs cut into the already limited resources of SNAP households, and these costs can be substantial.

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 The TFP unrealistically assumes adequate facilities and time for food preparation. Some families with low incomes cannot afford the upfront costs of utensils or appliances that the TFP assumes they have. In addition, the TFP does not take into account the time cost to prepare meals. 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.⁶³

Historically Marginalized People Face Specific Barriers to Accessing SNAP

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

Barriers for Black and Indigenous People 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-American citizens during World War II has undermined the trust women of color have in the federal government.⁶⁴

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 fact, 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. The stigma of receiving public benefits and the use of false narratives to justify underfunding benefits programs have further discouraged eligible recipients from applying for public benefits.65 The stigma surrounding public benefits is rooted in the perception that people who receive them are lazy and typically don't work. With that comes feelings of guilt or shame for many, preventing them from seeking assistance they actually need. Most people accessing public benefits like SNAP do work,66 but are concentrated in jobs that lack robust protections for workers, where employers pay low wages, provide few benefits, and offer unstable work schedules.

In addition, Indigenous communities have long been stripped of food sovereignty due to forced displacement by the government. Federal programs like SNAP and Food Distribution on Indian Reservations (FDPIR) reduce Tribal self-governance because Tribal leaders are usually excluded from federal decision-making about nutrition assistance. This prevents Tribes from administering the program in ways that meet the unique needs of their communities. The prohibition against using benefits from the FDPIR and SNAP during the same month, moreover, forces Indigenous households to choose which set of inadequate benefits to utilize—rather than providing an added layer of needed nutrition assistance.⁶⁷

Barriers for Undocumented and Immigrant Families

On top of facing barriers to paid 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 not 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.⁶⁸ "Non-qualified immigrants" include students and tourists, immigrants with temporary protected status, asylum applicants, and undocumented immigrants.⁶⁹

- "Non-qualified immigrants" are generally ineligible for federal public benefits, including SNAP.⁷⁰
- "Qualified immigrants," excluding children, still face
 a five-year waiting period before receiving public
 benefits.⁷¹ Plus, even if qualified, many still report
 not participating in SNAP due to a range of factors,
 including inaccurate information about the program,
 complicated program rules, language access barriers,
 discrimination, and stigma.⁷²

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People who reenter society after incarceration are another population at risk of food insecurity. Individuals with prior felony convictions face health, economic, and social obstacles not only during their incarceration but also immediately upon release. Access to programs like SNAP provides support as reentering individuals regain their footing.⁷³

However, some states subject people with a drug-related felony conviction to restrictions or complete bans on food assistance under SNAP—effectively creating a life sentence despite their having served their sentences and/or paid their fines. PRWORA also imposed a lifetime ban on those with a previous drug felony conviction against receiving SNAP and Temporary Assistance for Needy Families (TANF).⁷⁴ This law allowed states to modify or repeal the ban altogether.⁷⁵

- Currently, 21 states still have the ban in place with modified conditions.⁷⁶ For example, in Kansas, those with drug felony convictions must complete an approved drug treatment program and pass a drug testing plan in order to access SNAP.⁷⁷ In both Minnesota and Missouri, applicants must pass random drug tests, and, in Missouri, they have to pay for the tests themselves.⁷⁸
- Only one state, South Carolina, still has the full ban in place. Only there can an individual who has served their full sentence for a drug felony conviction be prohibited from receiving SNAP benefits for the rest of their lives.⁷⁹
- The lifetime ban disproportionately harms women.
 Women are more likely to be convicted of drug crimes than men, both at the state and federal levels.⁸⁰ As a result, more formerly incarcerated women reentering society than formerly incarcerated men could be denied SNAP benefits.
- The lifetime ban also disproportionately harms people
 of color, especially Black people, because they are
 incarcerated in the United States at much higher rates
 for drug crimes than White people.⁸¹ The SNAP drug
 felony ban thus perpetuates racial injustice in the
 carceral system, negatively affecting communities of
 color.

Survey evidence shows higher poverty rates for LGBTQIA+ individuals. Government poverty and hunger data often do not capture sexual orientation and gender identity, but surveys conducted by nonprofits and academics often are not administered as frequently as government data is updated. This data discrepancy makes it harder to detect underlying gaps that exist in SNAP eligibility and benefits for the LGBTQIA+ community. Regardless, studies have shown that LGBTQIA+ people are susceptible to discrimination in both the application process and during benefit use, creating unique challenges.

- IDs must be presented while applying for public benefits like SNAP, so many LGBTQIA+ people risk losing out on critical benefits.
 - o In 2020, the Center for American Progress published a survey that revealed 66 percent of transgender LGBTQIA+ respondents and 23 percent of cisgender LGBTQIA+ respondents experienced some level of difficulty obtaining accurate identification documents due to discrimination.⁸³
 - o The 2022 Transgender Equality Report found that 22 percent of respondents were verbally harassed, assaulted, asked to leave a location, or denied services or benefits as a result of showing an ID with a name or gender that did not match their gender presentation in public.⁸⁴
- Even if an application is approved, identification requirements accompanying benefits use may also present barriers for LGBTQIA+ people. While most states only require a pin number for security purposes, two states, Massachusetts and Missouri, require photo identification on electronic benefit transfer cards.⁹⁵ This may exacerbate or revive gender dysphoria and make recipients susceptible to discrimination at retailers if their gender markers do not reflect their gender identity.
- 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.⁸⁶ Stigma associated with these jobs can discourage individuals from applying for federal programs such as SNAP, which may entail reporting such income.⁸⁷
- Nineteen percent of trans people surveyed reported that they have avoided getting necessary services for themselves or their families for fear of experiencing discrimination.⁸⁸

Barriers for Survivors of Domestic Violence and Sexual Assault

In the United States, women living in poverty are more likely to experience domestic abuse and sexual assault, and the violence perpetrated against them can make it impossible to escape poverty. ⁸⁹ Women who had experienced domestic violence in the previous three months or who were using emergency and community food assistance had the highest rates of food insecurity. ⁹⁰ In order to exercise control over their partners, abusers often actively prevent their partners from attaining economic independence. SNAP helps survivors of domestic violence and sexual assault establish basic economic security. ⁹¹ Unfortunately, survivors often confront barriers to accessing SNAP.

- Survivors attempting to leave an abuser have reported administrative issues that prolong periods of food insecurity, such as:⁹²
 - 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 is indicated; and
 - o Delays in receiving EBT cards.
- Abusers may exercise control over their partners by keeping key documents and financial information from them, which can make it hard for survivors to provide documents they need for verification in the application process.⁹³ If survivors are fleeing an abusive home, moreover, they may not have been able to secure needed documents.
 - o Survivors may also be asked to provide documentation identifying themselves as a survivor of domestic violence or sexual assault (DV/SA), such as protection orders, court documents, police reports, etc., which may subject the survivor to more trauma at the hands of the police or other state employees.⁹⁴
 - If survivors cannot obtain the required documents on their own, they may need to come back in contact with their abuser in order to procure documents, subjecting them to further abuse.

 Domestic violence and sexual assault survivors may also face challenges obtaining and maintaining 20 hours of employment per week because of abuse, instability in child care or housing or needing to take time off work to attend court hearings.

Barriers for People with Disabilities

People with disabilities face disproportionately higher rates of food insecurity and poverty than non-disabled people. In June 2023, 24 percent of people with disabilities experienced food insufficiency compared to 9 percent of non-disabled people. ⁹⁵ Almost one in four women with disabilities (24.3 percent) reported not having enough food to eat in the prior seven days. ⁹⁶ Disabled Black, non-Hispanic women (31.4 percent) were nearly five times more likely and disabled Latinas (25.3 percent) were nearly four times more likely than non-disabled White, non-Hispanic men (6.8 percent) to lack enough food to eat. ⁹⁷

Too often, people with disabilities face administrative burdens that make it difficult for them to access or maintain assistance for which they otherwise qualify.

These burdens come in many forms, including inflexible in-person appointments, backlogs with long wait times, lengthy and complicated paperwork, and complex or confusing application processes.

- SNAP's time limits restrict access for what the program refers to as "able-bodied adults without dependents" or ABAWDs.98 Theoretically, only non-disabled adults must meet the work requirement or face a time limit. But in reality, people with disabilities can face challenges in proving they have a qualifying disability for the purpose of the SNAP exception.
 - o To qualify for SNAP's exceptions for disabled people, a person with disabilities must receive Supplemental Security Income (SSI), Social Security Disability Insurance (SSDI), or other disability benefits.⁹⁹ Many people with disabilities have applied for such benefits but have been waiting months or years for their applications to be accepted.
 - Other people with disabilities do not meet the strict eligibility requirements for SSI or SSDI yet face economic insecurity and would benefit from SNAP's exceptions.
 - SNAP's exceptions may be especially challenging for people with "invisible" disabilities. like chronic pain or autism spectrum disorder, to meet.¹⁰⁰

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 SNAP's time limits harm many working-age adults, but especially people with disabilities who do not qualify for the exception. 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 despite working.

Barriers for Older Adults

Older people have high food insecurity and nutrition-related health risks. In 2021, over 5 million households with an older adult, age 60 and older, were food insecure.¹⁰¹ Black and Latinx households with older adults also have disproportionately high rates of food insecurity compared to White households.¹⁰² In addition, older women specifically have higher poverty rates,¹⁰³ are more likely to live alone,¹⁰⁴ and are more likely to be food insecure than older men.¹⁰⁵ Having reliable access to enough food is critical for everyone, but it is particularly important as people age.

Despite their high food insecurity, **SNAP enrollment rates** among older adults have consistently remained low.¹⁰⁶ Approximately three out of five seniors who qualify to receive SNAP are missing out on these benefits.¹⁰⁷

- Older adults aged 52 or below (54 or below starting in October 2024) are not exempt from SNAP time limits, yet may face challenges in finding and keeping employment because of age-based discrimination especially for older workers who are women or people of color.¹⁰⁸
- Despite being more likely to live on fixed incomes, older adults receive an average SNAP benefit of \$118 a month.¹⁰⁹
 - Adults over 60 are eligible for higher SNAP benefits by deducting their medical expenses. However, many are not aware of this option.
 - o Even when aware, finding documentation of expenses can be burdensome, especially for older adults with mobility difficulties or cognitive decline.¹¹¹
- States can opt to participate in the Elderly Simplified Application Project (ESAP) and Standard Medical Deduction (SMD). ESAP is a demonstration project designed to streamline enrollment in SNAP for seniors with very low incomes. SMD allows state agencies to simplify the medical expense deduction for households with a person aged 60 or older. Currently, only 22 states currently participate in ESAP and 24 participate in SMD.¹¹²

Barriers for College Students

College students are one of the fastest growing food-insecure populations. According to the National Center for Education Statistics, more than 4 million students in higher education are experiencing food insecurity, and 2.3 million more students have marginal food insecurity. When students struggle to meet basic needs, they risk lower retention and graduation rates as compared to their peers with better support from families. In addition, food insecurity on college campuses disproportionately affects people of color. Black students reported the highest levels of food insecurity (34.6 percent) and Native Hawaiian or other Pacific Islander students, and American Indian or Alaska Native students followed closely with reported rates of 32.6 percent and 29.9 percent, respectively.¹¹⁴

During the pandemic, many students struggling with food insecurity qualified for temporary food assistance due to work restrictions for students being waived by the USDA. However, in 2023, those restrictions returned and now millions of students are once again food insecure.

- The current SNAP rules require students with low incomes to either work 20 hours per week or participate in a work-study program to be eligible. This is on top of the time they spend in class, studying, completing assignments, and meeting with faculty. These rules force students experiencing food insecurity to choose between their academic performance and employment, which can diminish their chances of completing their degree.
- Additionally, due to the 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 about on-campus help obtaining SNAP.¹¹⁵
- Even if they are able to access SNAP benefits, students
 with low incomes, 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.

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Policy Recommendations

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 individuals and families while supporting the economy. It is imperative to increase SNAP benefits and improve SNAP administration so that all women and their families can put food on the table.

- Ease requirements that undermine the financial security of SNAP recipients facing multiple forms of discrimination by increasing gross income thresholds and asset limits, eliminating the time limits and work requirements, and making the exception for people with disabilities less restrictive.
- Increase benefit adequacy to ensure that, SNAP participants can afford a healthier diet without cost-time trade-offs, and money needed for other basic needs like shelter, clothing, and hygiene items is not being used to make up for the shortcomings of SNAP allotments.
- Improve application processes, such as by permanently adopting administrative flexibilities created during the pandemic, 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.
- Improve outreach efforts, such as by increasing language and interpreting services for non-native English speakers and people with disabilities; and funding; and improving targeted messaging for LGBTQIA+ individuals, immigrant families, and young people, especially college students; and aligning information collected through financial aid offices to connect potentially eligible students.
- Advance racial and gender justice by giving more autonomy for Tribes and facilitating better inclusion of Indigenous,
 Black, and Latinx communities in the policymaking process; removing the five-year residency waiting period in SNAP
 that most documented immigrant adults face; and ensuring SNAP benefit administrators participate in anti-bias
 training.
- Improve data collection on SNAP participation by allowing people to self-identify as having a disability and adding sexual orientation and gender identity as voluntary demographic questions to get a better picture of food insecurity and SNAP participation rates.¹¹⁶
- **Protect and promote SNAP choice** so SNAP recipients retain the autonomy to purchase foods like all other shoppers based on the health and nutritional needs of an individual or household, culturally preferred food, and foods that are available locally.

ABOUT FRAC

The Food Research & Action Center (FRAC) improves the nutrition, health, and well-being of people struggling against poverty-related hunger in the United States through advocacy, partnerships, and by advancing bold and equitable policy solutions. For more information about FRAC, or to sign up for FRAC's e-newsletters, go to

ABOUT NWLC

The National Women's Law Center fights for gender justice—in the courts, in public policy, and in our society—working across the issues that are central to the lives of women and girls. We use the law in all its forms to change culture and drive solutions to the gender inequity that shapes our society and to break down the barriers that harm all of us—especially women of color, LGBTQ people, and low-income women and families. For 50 years, we have been on the leading edge of every major legal and policy victory for women.

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- 1 Sammi Albinder, Andrea Flynn, Richelle Gernan, Sarah Hassmer, and Rakeen Mabud, "The Roots of Discriminatory Housing Policy: Moving Toward Gender Justice in Our Economy (August 2, 2022), https://nwlc.org/resource/the-roots-of-discriminatory-housing-policy-moving-towards-gender-justice-in-our-economy/. National Women's Law Center, "Social Determinants of Health Metrics for Women, State by State," May 4, 2023, https://nwlc.org/resource/health-metrics-for-women-state-by-state/.
- 2 Jasmine Tucker and Julie Vogtman, "Hard Work Is Not Enough: Women in Low-Paid Jobs," National Women's Law Center, July 2023, https://nwlc.org/resource/when-hard-work-is-not-enough-women-in-low-paid-iobs/.
- 3 Sarah Javaid, "A Window into the Wage Gap: What's Behind It and How to Close It" (National Women's Law Center, January 2024), https://nwlc.org/resource/wage-gap-explainer/#:--text=Women%20 in%20the%20United%20States.dollar%20to%20make%20ends%20meet.
- 4 Richard W. Johnson, Karen E. Smith, and Barbara A. Butrica, "Lifetime Employment-Related Costs to Women of Providing Family Care" (Urban Institute, February 2023), https://www.dol.gov/sites/dolgov/files/WB/Mothers-Families-Work/Lifetime-caregiving-costs 508.pdf.
- 5 Shengwei Sun, "National Snapshot: Poverty Among Women & Families in 2022" (National Women's Law Center, November 2023), https://nwlc.org/resource/national-snapshot-poverty-among-women-families/.
- 6 Sarah Javaid and Kathryn Domina, "Women of Color, Disabled Women, and LGBT Adults Struggle to Afford Food and Housing Costs" (National Women's Law Center, December 2023), https://nwlc.org/ resource/women-of-color-disabled-women-and-lgbt-adults-struggle-to-afford-food-and-housing-costs/#.
- 7 Diana Boesch and Shilpa Phadke, "When Women Lose All the Jobs: Essential Actions for a Gender-Equitable Recovery" (Center for American Progress, February 1, 2021), https://www.americanprogress.gr/ org/article/women-lose-jobs-essential-actions-gender-equitable-recovery/.
- 8 Emily J. Martin, "Women and the Workplace—What We Learned from COVID" (American Bar Association, October 31, 2023), https://www.americanbar.org/groups/crsi/publications/human rights magazine home/labor-and-employment-rights/women-and-the-workplace/#:-:text=May%202023%20was%20the%2029th.jobs%20in%20the%20same%20period).
- 9 Ibid., 6
- 10 Marissa Koontz, "Debt Ceiling Deal Changes SNAP Recipients' Work Requirements," Farm Bill Law Enterprise, July 11, 2023, https://www.farmbilllaw.org/2023/07/11/debt-ceiling-deal-changes-snap-recipients-work-requirements/.
- 11 U.S. Department of Agriculture, Food and Nutrition Service, "Supplemental Nutrition Assistance Program: Number of Persons Participating" (March 8, 2024), https://fns-prod.azureedge.us/sites/default/files/resource-files/snap-persons-3.pdf.
- 12 National Women's Law Center calculations based on U.S. Census Bureau, 2023 Annual Social and Economic Supplement using Sarah Flood et al., Integrated Public Use Microdata Series (IPUMS): Version 10.0 [dataset] (Minneapolis: University of Minnesota, 2023), https://ipums.org/, Non-elderly adults are those ages 18 to 64.
- 13 Ibid.
- 14 Nicholas Zill, "Food Stamps and Family: SNAP Recipients by Family Structure," (Institute for Family Studies, April 25, 2023), https://ifstudies.org/blog/food-stamps-and-family-snap-recipients-by-family-structure.
- 15 Lindsay Mahowald, Mathew Brady, and Caroline Medina, "Discrimination and Experiences Among LGBTQ People: 2020 Survey Results" (Center for American Progress, April 21, 2021), https://www.americanprogress.org/article/discrimination-experiences-among-lgbtg-people-us-2020-survey-results/.
- 16 Ty Jones Cox, "SNAP Is and Remains Our Most Effective Tool to Combat Hunger," Center on Budget and Policy Priorities, February 14, 2023, https://www.cbpp.org/blog/snap-is-and-remains-our-most-effective-tool-to-combat-hunger#:--:text=People%20with%20disabilities%3A%20SNAP%20helps,SNAP%20particularly%20important%20for%20them.
- 17 National Women's Law Center calculations based on U.S. Census Bureau, "Current Population Survey, 2023 Annual Social and Economic Supplement (CPS ASEC)." (last revised September 5, 2023), https://www.census.gov/data/datasets/time-series/demo/cps/cps-asec.html. Numbers are rounded to the nearest thousandth.
- 18 Food Research and Action Center. The Role of the Supplemental Nutrition Assistance Program in Improving Health and Well-Being. (December 2017). https://frac.org/wp-content/uploads/hunger-health-vole-snap-improving-health-well-being.pdf.
- 19 Adam Drewnowski, "Food insecurity has economic root causes," Nature Food 3, no. 555-556 (2022), https://www.nature.com/articles/s43016-022-00577-w#citeas
- 20 Steven Carlson and Joseph Llobrera, "SNAP is Linked with Improved Health Outcomes and Lower Health Care Costs," Center on Budget and Policy Priorities, December 14, 2022, https://www.cbpp.org/research/food-assistance/snap-is-linked-with-improved-health-outcomes-and-lower-health-care-costs.
- 21 Ibid.
- 22 Ibid.
- 23 Ibid.
- 24 Sonik RA, "Massachusetts Inpatient Medicaid Cost Response to Increased Supplemental Nutrition Assistance Program Benefits," American Journal of Public Health 106, no. 443-448 (2016),

https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4880217/

- 25 Jaclyn Bertoldo et al., "Food Insecurity and Delayed or Forgone Medical Care During the COVID-19 Pandemic," American Journal of Public Health 12, no. 5 (2022), https://ajph.aphapublications.org/doi/full/10.2105/AJPH.2022.306724?role=tab.
- 26 Ibid.

- 27 Anna E. Austin, Madeline Frank, and Meghan E. Shanahan, "Association of State Supplemental Nutrition Assistance Program Eligibility Policies with Adult Mental Health and Suicidality," JAWA Network Open 6, no.4 (2022), <a href="https://jamanetwork.com/journals/jamanetw
- 28 Jiying Ling, Paige Duren, and Lorraine B. Robbins, "Food Insecurity and Mental Well-Being Among Low-Income Families During COVID-10 Pandemic," American Journal of Health Promotion 36, no.7 (2022), https://www.ncbi.nlm.nih.gov/pmc/articles/PMC9014344/#:--text=Among%20low%2Dincome%20families%20with.maternal%20depression%20and%20domestic%20 violence.8text=Moreover%2C%20the%20effects%20of%20food,according%20to%20different%20geographic%20locations.
- 29 Ihid
- 30 Heather Hartline-Grafton, "The Impact of Food Insecurity on Women's Health," Food Research and Action Center, last visited March 2024, <a href="https://frac.org/blog/impact-food-insecurity-womens-health-see also Steven Carlson & Brynne Keith-Jennings", "SNAP Is Linked with Improved Nutritional Outcomes and Lower Health Care Costs", Center on Budget & Policy Priorities, Jan. 17, 2018, https://www.cbpp.org/research/snap-is-linked-with-improved-nutritional-outcomes-and-lower-health-care-costs.
- 31 American Psychology Association, "Hunger Can Lead to Anger, But It's More Complicated than a Drop in Blood Sugar, Study Says," Medical Xpress, June 11, 2018, https://medicalxpress.com/news/2018-06-hunger-complicated-blood-sugar,html.
- 32 Center on Budget and Policy Priorities, "Policy Basics: The Supplemental Nutrition Assistance Program (SNAP)," June 25, 2019, https://www.cbpp.org/research/food-assistance/policy-basics-the-supplemental-nutrition-assistance-program-snap.
- 33 Bryce McKibben, Jiayao Wu, and Sara Abelson, "New Federal Data Confirm that College Students Face Significant and Unacceptable Basic Needs Insecurity" (The Hope Center, August 3, 2023), https://hope.temple.edu/npeas
- 34 Sara Goldrick-Rab, Carrie R. Welton, and Vanessa Coca, "Parenting While in College: Basic Needs Insecurity Among Students With Children," Hope Center for College, Community, and Justice, May 2020, https://frac.org/wp-content/uploads/2019 ParentingStudentsReport.pdf.
- 35 UTHealth Houston School of Public Health, "Economic and Business Benefits of SNAP" (June 13, 2023), https://sph.uth.edu/research/centers/dell/legislative-initiatives/tx-rpc-project-reports/Economic%20Impact%20sNAP 2023.pdf.
- 36 Ibid.
- 37 U.S. Department of Agriculture, Food and Nutrition Service, "SNAP Eligibility," April 26, 2024, https://www.fns.usda.gov/snap/recipient/eligibility
- 38 Ibid.
- 39 U.S. Department of Agriculture, Food and Nutrition Service, "Broad-Based Categorical Eligibility (BBCE) States Chart," January 2024, https://www.fns.usda.gov/snap/broad-based-categorical-eligibility.
- 40 U.S. Department of Agriculture, Food and Nutrition Service, "SNAP Eligibility," (2024), https://www.fns.usda.gov/snap/recipient/eligibility
- 41 Walker Stevens, "Mitigating SNAP Benefits Cliffs," National Conference of State Legislators, January 17, 2024, https://www.ncsl.org/human-services/mitigating-snap-benefits-cliffs; Caroline Ratcliffe et al., "The Unintended Consequences of SNAP Asset Limits," Urban Institute, July 26, 2016,
- 42 Ibid.
- 43 Molly Rosbach, "Study: Most Americans Don't Have Enough Assets to Withstand 3 Months Without Income," Oregon State University, August 4, 2020, https://today.oregonstate.edu/news/study-most-americans-don%E2%80%99t-have-enough-assets-withstand-3-months-without-income.
- 44 Caroline Ratcliffe, Signe-Mary McKernan, Laura Wheaton, and Emma Kalish, "The Unintended Consequences of SNAP Asset Limits" (Urban Institute, July 2016), https://www.urban.org/sites/default/files/publication/82886/2000872-The-Unintended-Consequences-of-SNAP-Asset-Limits.pdf.
- 45 U.S. Department of Agriculture, Food and Nutrition Service, "Broad-Based Categorical Eligibility," January 2024, https://www.fns.usda.gov/snap/broad-based-categorical-eligibility.
- 46 Food Resource and Action Center, "U.S. Hunger Solutions: Best Practices for Improving Access to SNAP for People With Disabilities, 2017, https://frac.org/wp-content/uploads/best-practice-improving-snap-access-people-with-disabilities.pdf.
- 47 Aliss Higham, "SNAP Recipients Wait Six Months for Benefits as Delays Chaos Continues," Newsweek, February 7, 2024, https://www.newsweek.com/snap-benefits-tennessee-six-month-payment-delays-1867709.
- 48 U.S. Department of Agriculture, Food and Nutrition Service, "SNAP Work Requirements" (February 26, 2024), https://www.fns.usda.gov/snap/work-requirements
- 49 Ibid.
- 50 Jhumpa Bhattacharya et al., "Work Requirements Are Trash" (The Maven Collaborative, February 2024), https://www.mavencollaborative.org/wp-content/uploads/2024/02/Maven-x-CLASP-Work-Requirements-Are-Trash-2024.pdf.
- 51 Katie Bergh and Dottie Rosenbaum, "Debt Ceiling Agreement's SNAP Changes Would Increase Hunger and Poverty for Many Older Low-Income People; New Exemptions Would Help Some Others" (Center on Budget and Policy Priorities, May 31, 2023), https://www.cbpp.org/research/food-assistance/debt-ceiling-agreements-snap-changes-would-increase-hunger-and-poverty-for#:-:text=Once%20fully%20phased%20in%2C%20this,losing%20benefits%20under%20this%20bill.
- 52 Ibid.
- 53 Ellen Vollinger, "Let's End Time Limits on SNAP Benefits," Food Research & Action Center" (March 14, 2023), https://frac.org/blog/lets-end-time-limits-on-snap-benefits.
- 54 National Women's Law Center, "SNAP Time Limits Harm Women, LGBTQIA+ People, AND Families" (Food & Research Center, September 2023), https://frac.org/wp-content/uploads/NWLC-FRAC-SNAP-Time-Limits-Fact-Sheet.pdf.
- 55 Ibid.
- 56 U.S. Department of Agriculture, Food and Nutrition Service, "ABAWD Waivers," updated January 12, 2024, https://www.fns.usda.gov/snap/ABAWD/waivers#:~:text=This%20is%20called%20the%20 ABAWD,the%20general%20SNAP%20work%20requirements.
- 57 U.S. Department of Agriculture, Food and Nutrition Service, "SNAP and the Thrifty Food Plan," November 3, 2023, https://www.fns.usda.gov/snap/thriftyfoodplan.
- 58 U.S. Department of Agriculture, Food and Nutrition Service, "USDA Modernizes the Thrifty Food Plan, Updates SNAP Benefits," August 16, 2021, https://www.usda.gov/media/press-releases/2021/08/16/usda-modernizes-thrifty-food-plan-updates-snap-benefits.
- 59 Laura Wheaton and Danielle Kwon, "Effect of the Reevaluated Thrifty Food Plan and Emergency Allotments on Supplemental Nutrition Assistance Program Benefits and Poverty" (The Urban Institute, August 2022), https://www.urban.org/sites/default/files/2022-08/Effect%20of%20the%20Reevaluated%20Thrifty%20Food%20Plan%20and%20Emergency%20Allotments%20an%20Supplemental%20 Nutrition%20Assistance%20Program%20Benefits%20and%20Poverty.pdf.
- 60 Anona Neal and Kyle Ross, "To Support Food Security, the Thrifty Food Plan Increase Should Be Protected in the 2023 Farm Bill," Center for American Progress, August 23, 2023, https://www.americanprogress.org/article/to-support-food-security-the-thrifty-food-plan-increase-should-be-protected-in-the-2023-farm-bill/.
- 61 Heather Hartline-Grafton and Ellen Vollinger, "Thrifty Food Plan 101 (Part 2)" (Food Research and Action Center), https://frac.org/blog/thrifty-food-plan-101-part-2#:--text=Research%20shows%20 that%20obtaining%20an,%2C%20fish%2C%20and%20lean%20meat.
- 62 Ibid.
- 63 Steven Carlson, "More Adequate SNAP Benefits Would Help Millions of Participants Better Afford Food," Center on Budget and Policy Priorities, July 30, 2019, https://www.cbpp.org/research/food-assistance/more-adequate-snap-benefits-would-help-millions-of-participants-better.
- 64 U.S. Department of Health & Human Services, Administration for Children and Families, "Trauma," accessed August 3, 2020, https://www.acf.hhs.gov/trauma-toolkit/trauma-concept; Jessica R. Goodkind et al., "Rebuilding TRUST: A Community, Multi-Agency, State, and University Partnership to Improve Behavioral Health Care for American Indian Youth, their Families, and Communities," Journal of Community Psychology 39, no. 4 (2011): 452-477; James Avery, "The Sources and Consequences of Political Mistrust Among African Americans," American Politics Reserve 34, no. 5 (2006): 653-682, https://www.researchgate.net/publication/240701948 The Sources and Consequences of Political Mistrust among African Americans.
- 65 Luis Guardia and Allison Lacko, "To End Hunger, We Must End Stigma," (Food Research and Action Center, December 1, 2021), https://frac.org/blog/endhungerendstigma.
- 66 National Women's Law Center., supra note 54.
- 67 Native Farm Bill Coalition, "Top Priorities for New COVID-19 Response Legislation," April 22, 2020, https://jm4.e6c.myftpupload.com/wp-content/uploads/2020/04/4-22-20-NFBC-COVID-TopPriorities.
- 68 Tanya Broder and Gabrielle Lessard, "Overview of Immigrant Eligibility for Federal Programs" (National Immigration Law Center, updated October 2023), https://www.nilc.org/issues/economic-support/overview-immeligfedprograms/.

69 Ibid.

- 70 Ibid.
- 72 Food Research and Action Center, "Food Over Fear: Overcoming Barriers to Connect Latinx Immigrant Families to Federal Nutrition and Food Programs" (December 2020), https://frac.org/wp-content/ uploads/NILC Latinx-Immigrant-Families.pdf
- 73 Carol Joan Newark and Naomi F. Sugie, "Repealing the Food Stamps Ban Can Reduce Recidivism" (June 1, 2023), https://scholars.org/contribution/repealing-food-stamps-ban-can-reduce.
- 74 Margaret Love & Nick Sibilla, "Access to SNAP and TANF Benefits after a Drug Conviction: A Survey of State Laws" (Collateral Consequences Resources Center, December 2023), https:// ccresourcecenter.org/national-snap-tanf-drug-felony-study/
- 75 Ibid.
- 76 Ibid., 73.
- 77 Carol Joan Newark and Naomi F. Sugie, "Repealing the Food Stamps Ban Can Reduce Recidivism" (June 1, 2023), https://scholars.org/contribution/repealing-food-stamps-ban-can-reduce.
- 78 Ibid
- 79 Ibid.
- 80 The Network for Public Health Law, "The Effects of Denying SNAP Benefits to People with a Felony Drug Conviction" (updated April 2020), https://www.networkforphl.org/wp-content/ uploads/2020/04/Issue-Brief-Snap-Felon-Ban-Updated-1.pdf.
- ourdes Ashley Hunter et al., "Intersecting Injustice: A National Call to Action," Social Justice Sexuality Project, March 2018, https://static1.squarespace.com/static/5a00c5f2a803bbe2eb0ff14e/t/5 f45758d46742a5b8f78/1523216213447/FINAL+PovertyReport_HighRes.pdf.
- 83 Shannon Henris, "Anti-LGBTQ+ Discrimination and Barriers to Accessing Public Benefits," Georgetown Journal on Poverty Law & Policy, February 6, 2023, https://www.law.georgetown.edu/povertyjournal/blog/anti-lgbtg-discrimination-and-barriers-to-accessing-public-benefits/
- 84 Sandy E. James, Jody L. Herman, Laura E. Durso, and Rodrigo Heng-Lehtinen, "Early Insights; A Report of the 2022 U.S. Transgender Survey" (National Center for Transgender Equality, February 2024), OUSTS%20Early%20Insights%20Report_FINAL.pdf
- 85 National Conference of State Legislatures, "Restriction on Use of Public Assistance Electronic Benefit Transfer (EBT) Cards," December 12, 2019, https://www.ncsl.org/human-services/ebt-electronicbenefit-transfer-card-restrictions-for-public-assistance.
- 86 S.E. James et al., "The Report of the 2015 U.S. Transgender Survey," National Center for Transgender Equality, December 2016, https://transequality.org/sites/default/files/docs/usts/USTS-Full-Report-Dec17.pdf 77.
- 88 Lindsay Mahowald, Mathew Brady, and Caroline Medina, "Discrimination and Experiences among LGBTQ People in the U.S.: 2020 Survey Results," Center for American Progress (Apr. 21, 2021), https:// www.americanprogress.org/article/discrimination-experiences-among-lgbtq-people-us-2020-survey-results/
- 89 Nathan N. Cheek, Bryn Bandt-Law, and Stacey Sinclair, "Women in Poverty Experience More Gender-based Violence, but Get Less Help," The Society for Personality and Social Psychology September 6, 2023, https://spsp.org/news/character-and-context-blog/cheek-bandt-law-sinclair-less-support-poor-female-abuse-victims#:-:text=Together%2C%20our%20studies%20suggest%20 that.bystander%20intervention%20and%20social%20support.
- 90 Sidney Brandhorst and Dessie Lee Clark, "Food Security for Survivors of Intimate Partner Violence: Understanding the Role of Food in Survivor Well-Being," Health Social Care Community 30, no. 6 (2022), https://www.ncbi.nlm.nih.gov/pmc/articles/PMC10092206/pdf/HSC-30-e6267.pdf
- 91 Shaina Goodman, "The Difference Between Surviving and Not Surviving: Public Benefits Programs and Domestic and Sexual Violence Victims' Economic Security," National Resource Center on Domestic Violence, January 2018, https://vawnet.org/sites/default/files/assets/files/2018-01/TheDifferenceBetweenSurvivingandNotSurviving Jan2018.pdf.
- 92 Ibid.
- 93 Ibid.
- 95 Alexandra Ashbrook, "Take Action for Economic Security and Justice for People with Disabilities by Improving Access to Nutrition," Food Research & Action Center (July 26, 2023), https://frac.org/ blog/ada-anniversary-economic-security-justice
- 96 Sarah Javaid and Kathryn Domina., supra note 6.
- 97 Ihid

102 Ibid.

- 98 U.S. Department of Agriculture, Food and Nutrition Service, "SNAP Work Requirements" (February 26, 2024), https://www.fns.usda.gov/snap/work-requirements.
- 99 U.S. Department of Agriculture, Food and Nutrition Service, "SNAP Special Rules for the Elderly or Disabled" (November 7, 2023), https://www.fns.usda.gov/snap/eligibility/elderly-disabled-special-
- 100Ashley Burnside, "SNAP Time Limits Can Reduce Access for Disabled People," The Center for Law and Social Policy (April 25, 2023), https://www.clasp.org/blog/snap-time-limits-can-reduce-access-
- 101 Alexandra Ashbrook, "Food Insecurity Among Older Adults Is Often Invisible," Food Research and Action Center, May 19, 2023, https://frac.org/blog/food-insecurity-among-older-adults-is-often-
- 103 Shengwei Sun, "National Snapshot: Poverty Among Women & Families in 2022," National Women's Law Center, November 2023, https://nwlc.org/wp-content/uploads/2023/11/National-Snapshot-Poverty_ACCESSIBLE.pdf.
- 105 Denny Chan, Amber Christ, Tracey Gronniger, Sarah Hassmer, Sarah Javaid, Dorianne Mason, Amy Matsui, and Shengwei Sun, "The Economic Security and Health of Older Women of Color" (National Women's Law Center, June 2023), https://nwlc.org/resource/the-economic-security-and-health-of-older-women-of-color/.
- 106 Food Research & Action Center, "SNAP Map: SNAP Matters to Seniors," accessed February 2024, https://frac.org/research/resource-library/snap-map-snap-matters-to-seniors.
- 107 Food Research and Action Center, "SNAP Participation Lags Among Eligible Seniors in Every State, Putting Them at Greater Risk of Hunger," March 22, 2019, https://frac.org/news/snap-participationlags-among-eligible-seniors-in-every-state-putting-them-at-greater-risk-of-hunger
- 108 Beth Almeida and Christian E. Weller, "Promoting Economic Advancement for Older Women in the Workplace" (Center for American Progress, January 17, 2024), https://www.americanprogress.org/ article/promoting-economic-advancement-for-older-women-in-the-workplace/
- 109 Kathryn Cronquist and Brett Eiffes, "Characteristics of Supplemental Nutrition Assistance Program Households: Fiscal Year 2020," U.S. Department of Agriculture, June 2022, https://fns-prod. azureedge.us/sites/default/files/resource-files/Characteristics2020.pdf.
- 110 Food Research & Action Center, "Closing the Senior SNAP Gaps," accessed February 2024, https://frac.org/blog/closing-senior-snap-gaps.
- 112 U.S. Department of Agriculture, Food and Nutrition Service, "State Options Report," 2023, https://fns-prod.azureedge.us/sites/default/files/resource-files/snap-15th-state-options-report-october23.
- 113 Bryce McKibben, Jiayao Wu, and Sara Abelson, "New Federal Data Confirm that College Students Face Significant and Unacceptable Basic Needs Insecurity," The Hope Center, August 3, 2023, https:// hope.temple.edu/npsas
- 115 The Hope Center, "The Hope Center Survey 2021: Basic Needs Insecurity During The Ongoing Pandemic" (March 31, 2021), https://hope.temple.edu/sites/hope/files/media/document/ HopeSurveyReport2021.pdf.
- 116 Lourdes Ashley Hunter et al., supra note 82.