



## California School Nutrition Association

### 2013 Federal Issue Paper

**The California School Nutrition Association is a professional organization with more than 1500 members. CSNA members are foodservice professionals committed to providing healthy meals to more than 3.3 million California school children every day. Long a leader in setting standards for school meals and a la carte sales. CSNA supports continuous improvement through strong state and federal policies. To further the effectiveness of school meal programs, CSNA recommends the following:**

- ✓ **Congress should ask the Government Accountability Office to conduct a study of the costs and benefits of indexing school meal eligibility and reimbursements to reflect costs.** Federal child nutrition programs provide a basic reimbursement for all meals served that is essential support for providers who sponsor the programs. The law provides “special assistance” for low income households – those with income below 130% of the national poverty line are eligible for free school meals, and households between 130% and 185% receive school meals at a reduced price. The problem is that the statute applies a single, national standard for poverty, whereas some communities’ cost of living is substantially higher, resulting in families who are living in poverty relative to their location but which find themselves ineligible for the federal nutrition programs that are intended to assist them. If we are to achieve President Obama’s goal of ending childhood hunger in America by 2015 we must recognize that hunger and poverty are more prevalent in communities with high costs of living, and the federal government’s solutions must reflect these disparities.
- ✓ **Congress should explore options that would encourage schools to adjust to schedules so that ensure students have adequate time to consume meals.** Schools work tirelessly to help students eat, move and enjoy healthy balance and unfortunately many schools don’t provide students adequate amount of time to consume meals in order to encourage consumption of healthy foods. The recommendation is that schools have a minimum of 20 minutes after the student is served to eat a meal at school. Many students complain about not having enough time to eat school lunch. Kids who are well-nourished can and do perform better academically.
- ✓ **Congress should consider policies that will educate children about the benefits of nutrition and physical activity for lifelong wellness.** It is the position of California School Nutrition Association that sequential, standards based nutrition education is incorporated into pre-k through 12 curriculums in order to provide a foundation of life-long good nutrition practices, equip students to make nutritious choices and maximize utilization of the school based Child Nutrition Programs. Nutrition and learning go hand in hand. Therefore, nutrition education is coordinated from the classroom to the cafeteria where learning opportunities and experiences promote the practice of skills and reinforce attitudes which are needed for behavioral changes that will positively impact students' health. Nutrition Education empowers the student to select and enjoy healthy foods while learning about lowering their risks of chronic diseases and developing healthy lifestyles. Nutrition education is crucial to the well-being of every child.



## 2013 LEGISLATIVE ISSUE PAPER

Since 1946, the National School Lunch Act has functioned successfully as a grant-in-aid program. We believe Congress has made the correct decision in exempting school nutrition programs from sequestration. We request that Congress continue to invest in our children by providing nutritious school meals under the current funding structure. It is this structure that has allowed the program to succeed and become a model for the world. With this sense of history, SNA makes the following recommendations to protect the nutritional health of our children:

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- **SNA supports the elimination of the weekly limits on Grains and Meat/Meat Alternates served in the National School Lunch Program.** SNA strongly urges Congress and USDA to make this temporary solution for SY 2012-2013 permanent immediately.
- **SNA urges a delay in the implementation of the School Breakfast Program modifications pending resolution of outstanding issues related to the School Lunch Meal Pattern.** Upon implementation of the School Breakfast Program modifications, SNA urges the elimination of the weekly limits on Grains served in the School Breakfast Program and also recommends allowing full substitutability of Meat/Meat Alternates for Grains.
- **Section 205 of the Healthy, Hunger-Free Kids Act mandates that certain School Food Authorities annually increase their paid meal prices regardless of their financial solvency.** SNA asks Congress to amend Section 205 of the Healthy, Hunger-Free Kids Act by narrowing Section 205 to only those School Food Authorities that have a negative fund balance at the end of the previous school year.
- **Unpaid meal charges owed to the School Food Authority by participants in the program have increased significantly.** Congress should require USDA to establish a consistent national policy on how to address the debt incurred by the unpaid meal charges.



## **California School Nutrition Policy Platform: 2013-2014 Legislative Session**

*California School Nutrition Association (CSNA) has adopted this policy platform to assist in the development of legislative and policy positions by the organization and to serve as a guide in evaluating pending legislative and regulatory proposals.*

### **School Nutrition Standards**

Child Nutrition Programs administered by the United States Department of Agriculture (USDA) were developed to provide children access to nutritious food and nutrition education during the school day. Meals provided by the National School Lunch and School Breakfast Programs must meet nutrition standards set by the USDA in order to qualify for federal reimbursement. The nutrition standards are revised to reflect the latest research and follow the principles of the most recent Dietary Guidelines for Americans.

CSNA supports the position that nutrition standards be applied to all foods and beverages served on a school campus to support students' cognitive development and to foster and encourage healthy food habits that will last a lifetime.

### **Competitive Food Sales**

CSNA supports legislative efforts to improve the wellbeing of the children of California. Child Nutrition Programs work as partners in the education community to provide healthy meals to all children in order to improve student health and academic achievement.

CSNA supports the enforcement of Competitive Food Sales regulations and will work to improve the school nutrition environment in order to provide a consistent nutrition message to the children of California.

The Association will advocate for state and federal regulations, laws and policies that safeguard the health of students and maintain financial stability in the schools Child Nutrition Programs by authorizing only the food service program to sell food during the regularly scheduled meal periods.

## **Mealtime Management**

CSNA supports collaborative efforts to ensure that students have an adequate amount of time to consume meals in order to encourage consumption of healthy foods by children of California. CSNA recommends that schools ensure that students have a minimum of 20 minutes after they are seated, to consume a meal at school.

CSNA opposes measures that adversely impact and expand serving time resulting in less time for students to consume their meals in a healthy and appropriate manner.

## **Program Finance**

CSNA supports improved funding for child nutrition programs. Financial support for school nutrition programs is inadequate. Costs for food, supply, equipment, and labor are increasing more rapidly than the federal and state meal reimbursement rates are adjusted, jeopardizing school meal programs. CSNA appreciates Governor Brown's recognition of the lack of funding and strongly supports his proposal to include a 1.65% COLA for child nutrition in the 2013-14 state budget.

School meal programs must often be self supporting and some are expected to earn revenue in excess of costs. Federal and state regulations promulgate allowable expenditures for Cafeteria Funds. Cafeteria fund monies may be used only for expenditures necessary for the operation of child nutrition programs.

CSNA will support legislation and collaborative efforts among federal, state, and local entities to ensure that funding is available for quality child nutrition programs to support the health, development and education for all children.

The Association opposes any effort to manipulate overall public school funding that results in less financial support for education and for Child Nutrition Programs.

## **Nutrition Education**

It is the position of CSNA that sequential, standards based nutrition education is incorporated into pre-k through 12 curriculums in order to provide a foundation of life-long good nutrition practices, equip students to make nutritious choices and maximize utilization of the school based Child Nutrition Programs.

CSNA will initiate and support collaborative efforts including state and federal funding to Child Nutrition Programs to ensure a comprehensive coordinated Nutrition Education program is in schools.

## **Equipment and Facilities**

CSNA strongly advocates funding designated for the improvement of cafeteria equipment and facilities on school campuses to encourage consumption of healthy meals by the children of California.

- Provide funding to improve cafeteria facilities and replace outdated equipment
- Allocate funding for the modernization of food service facilities over 25 years old
- Authorize construction of cafeteria facilities where none exist

## **Access**

CSNA will support collaborative efforts and legislation to eliminate barriers to participation in Child Nutrition Programs.

## **Agriculture**

CSNA will support California's agriculture community in its efforts to supply Child Nutrition Programs with a safe and nutritious food supply that is provided to schools through flexible and efficient procurement and delivery systems.

## **Regulations**

CSNA will advocate for outcome-based regulations at the federal and state levels that are written and revised periodically, or as needed, with stakeholder involvement.

## **Meal Programs:**

### **National School Lunch Program (NSLP)**

CSNA supports the operation of the NSLP that is a federally assisted meal program operating in public and nonprofit private schools and residential child care institutions. It provides nutritionally balanced lunches to children each school day.

### **School Breakfast Programs**

It is the position of CSNA that participation in School Breakfast Programs has a positive impact on children's behavior and readiness to learn. Scientific research provides compelling evidence that under-nutrition negatively impacts behavior, school performance, and cognitive development in children. School breakfasts are required to conform to the Dietary Guidelines for Americans. In 2011, Superintendent of Public Instruction Jack O'Connell declared that Breakfast served in the Classroom did not interfere with instructional minutes.

## **USDA Summer Food Service Programs**

CSNA recommends that the Summer Food Service Program is implemented in all areas that qualify. The Summer Food Service Program is designed to fill that nutrition gap and make sure children can get the nutritious meals they need.

### **After School**

CSNA supports the federally-subsidized meals and snacks that attract children to out-of-school-time programs, where they can be active, engaged and safe while their parents are at work. The food also helps keep hunger at bay so children can fully participate in the academic and enrichment activities provided.

### **Fresh Fruit and Vegetable Program**

CSNA supports free fruits and vegetables, in all forms, in selected low-income elementary schools. The Program has been successful in introducing school children to a variety of produce that they otherwise might not have the opportunity to sample.

### **Wellness and Healthy Kids**

CSNA supports schools that implement the required Wellness Policies that promote:

- nutrition guidelines for all foods available at school
- goals for nutrition education
- goals for physical activity
- goals for other school-based activities designed to promote student wellness
- plans for evaluating implementation of the policy

School Wellness Policies are an important tool to address obesity and promote healthy eating habits and physical activity through changes in school environments.

### **Food Safety & Security**

CSNA recommends that all schools keep food safe and secure. School food safety programs should be based on the Process Approach Hazard Analysis Critical Control Point (HACCP).

## **Providing Equal Access and Improving Meal Quality in the School Meal Programs: Addressing Differences in Regional Cost of Living**

Barry Sackin, SNS

The National School Lunch Program, School Breakfast Program, Afterschool Snack Program, and Child and Adult Care Food Program are federal nutrition programs for all children and seniors, and also support the nation's goals for ending hunger and providing nutritional adequacy for people living near or below the national poverty line. However, there are many families living in poverty who are not eligible for the benefits of these programs because of where they live.

Federal child nutrition programs provide a basic reimbursement for all meals served that is essential support for providers who sponsor the programs. Additionally, the law provides "special assistance" for low income households - those with income below 130% of the national poverty line are eligible for free school meals, and households between 130% and 185% receive school meals at a reduced price. The problem is that the statute applies a single, national standard for poverty, whereas some communities' cost of living is substantially higher, resulting in families who are living in poverty relative to their location but which find themselves ineligible for the federal nutrition programs that are intended to assist them.

For example, according to the Council for Community and Economic Research, in 2009 the cost of living in Tucson was 98.8 percent of the national average. So, the Smiths who live in Tucson and have income of \$28,000 for a family of four qualified for free meals. But if the Smiths lived in Boston at 139.5 percent of the average cost of living and with income of \$39,000, they are living in poverty relative to their community standard but their children don't qualify. There is an obvious equity problem here.

The Council for Community and Economic Research generates the ACCRA Cost of Living Index. According to their website, "[t]he ACCRA Cost of Living Index is the most reliable source of city-to-city comparisons of key consumer costs available anywhere. ACCRA COLI data is recognized by the U.S. Census Bureau, US Bureau of Labor Statistics, CNN Money, and the President's Council of Economic Advisors."

ACCRA data is only one of several indices that can be used to assess the differences in cost of living in different communities. The Self-Sufficiency Standard (SSS) is a relative-

ly new measurement that calculates what income households with different configurations require to get by without public assistance. The majority of states have developed SSS tables by county. And the Bureau of Labor Statistics generates data by county for the Consumer Price Index that can be used for determining the variance in costs in communities nationally.

The goal of this proposal is to apply these measures to the federal nutrition programs so that there is an equal opportunity for all families to access the federal child nutrition programs based on comparable standards of living. The notion of locality adjustments is not new to federal programs. Federal salary schedules include locality pay adjustments. Medicaid and SCHIP allow states to apply a more regionalized index for eligibility. Even the school meal programs have a precedent for this in the provision of higher eligibility scales and reimbursement rates for Hawaii and Alaska.

The same rationale also applies to the rates at which meals are reimbursed in the child nutrition programs. With the exception of Alaska and Hawaii, all School Food Authorities receive the same per meal reimbursement, \$2.86 for a free school lunch this year. The impact of this is that schools in lower cost locations have a higher effective rate than schools in high cost areas, which results in a significant difference in meal quality. Consider the following example.

In a low cost area, a school district may be able to hire foodservice staff for minimum wage. Let's say the average hourly wage, with benefits and payroll taxes, is about \$10. In high cost areas it is likely to be over \$20. If both programs have similar productivity of 15 meals per labor hour (a very good rate), the schools in the lower cost area have an additional 67¢ per meal to spend on food. This helps these schools improve meal quality with more fruits and vegetables, including salad bars, and whole grain-rich foods that the Dietary Guidelines for Americans recommend. The differences are actually greater because the cost of goods in high cost areas is also higher.

A solution to this inequity is to index both income eligibility guidelines and meal reimbursement rates county by county across the country. This is not as complicated as it may at first appear. First, as stated earlier, there are several indices available to establish the index needed for this purpose.

Second, the simplest way to implement this concept is to create a tiered system. Based on the index selected, a range of five tiers could be established. For example, counties with an index value up to 110% of the base line (national average) would be tier 1.

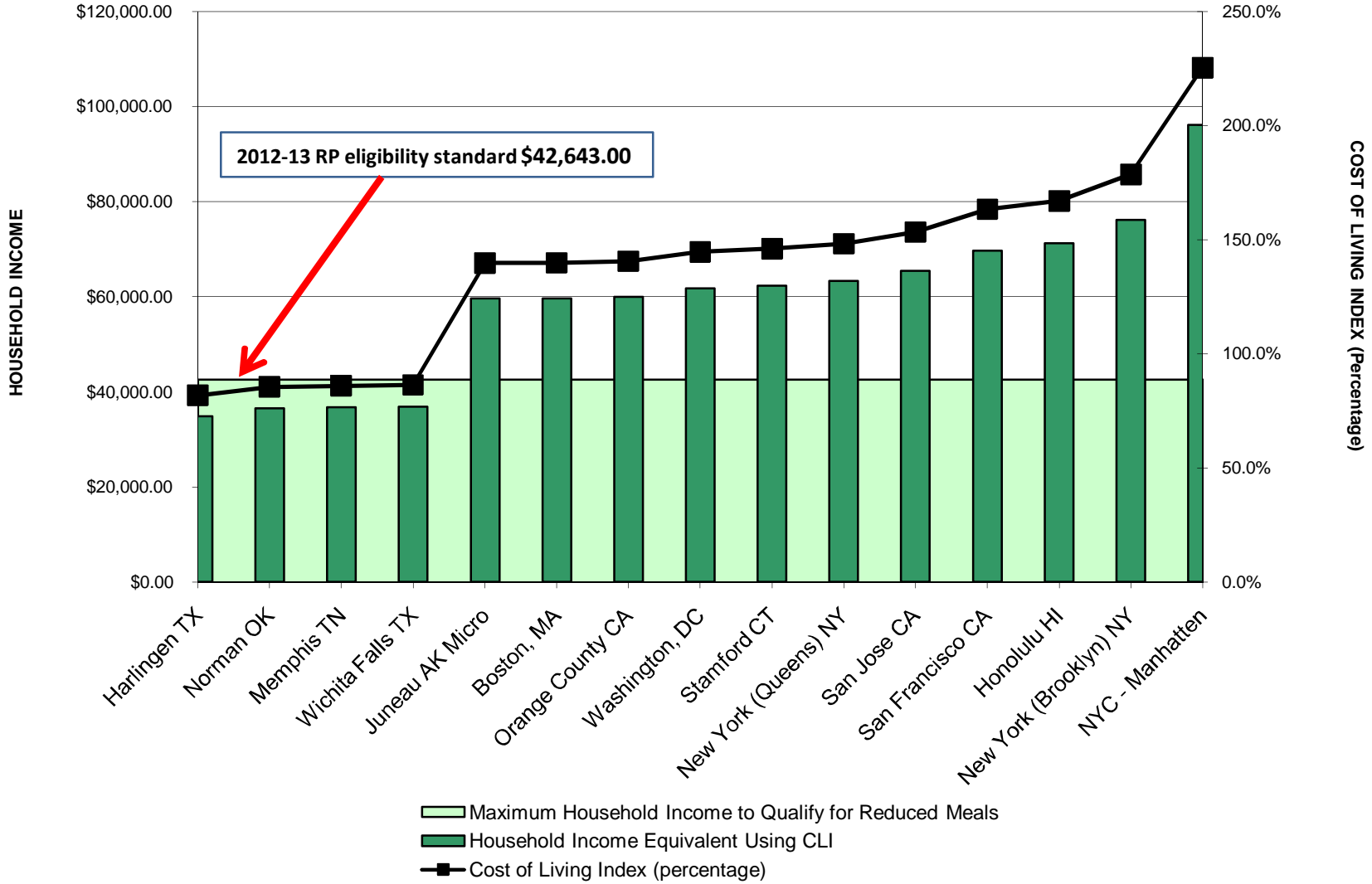
Counties between 110% and 120% would be tier 2, etc. Eligibility scales and reimbursement rates would be assigned to each tier as a factor of the baseline.

Third, this would not be too complicated to administer. Each year USDA publishes income eligibility guidelines. The guidelines currently present three different scales – contiguous states, Alaska, and Hawaii. Expanding this to five tiers and including Alaska and Hawaii in their appropriate tiers is not a significant change in the guidelines process. Each SFA would know its tier and apply those guidelines in certifying applications for free or reduced price meals. Similarly, the technology to apply different reimbursements to an SFA is not in the least complicated and would require only minor modifications to existing systems.

Finally, this proposal would use the current guidelines and reimbursement rates as the base for tier 1 and no SFA would experience a reduction in either eligibility or reimbursement rates. Tier 1 should be set no lower, and possibly slightly higher than the national average.

This proposal is really about equity and equality. If we are to achieve President Obama's goal of ending childhood hunger in America by 2015 we must recognize that hunger and poverty are more prevalent in communities with high costs of living, and the federal government's solutions must reflect these disparities.

### Family of Four Household Income for Reduced Price Meals Eligibility 2012-2013



HOUSEHOLD INCOME FOR REDUCED PRICE ELIGIBILITY FOR FAMILY OF FOUR 2012-13 \*

<b>URBAN AREA AND STATE</b>	<b>COST OF LIVING INDEX</b>	Family of Four Maximum Household Income to qualify for Reduced price meals	Adjustment for COLI	Household Income Adjustment for CLI for family of four
NYC - Manhattan	225.4	\$42,643	\$53,468	\$96,111
New York (Brooklyn) NY	178.6	\$42,643	\$33,507	\$76,150
Honolulu HI	167.0	\$42,643	\$28,578	\$71,221
San Francisco CA	163.4	\$42,643	\$27,030	\$69,673
San Jose CA	153.4	\$42,643	\$22,789	\$65,432
New York (Queens) NY	148.3	\$42,643	\$20,609	\$63,252
Stamford CT	146.1	\$42,643	\$19,668	\$62,311
Washington, DC	144.7	\$42,643	\$19,059	\$61,702
Orange County CA	140.6	\$42,643	\$17,329	\$59,972
Boston-Quincy MA Metro Div.	139.9	\$42,643	\$17,034	\$59,677
Juneau AK Micro	139.8	\$42,643	\$16,974	\$59,617
Wichita Falls TX	86.4	\$42,643	(\$5,781)	\$36,862
Memphis TN	86.0	\$42,643	(\$5,979)	\$36,664
Norman OK	85.6	\$42,643	(\$6,146)	\$36,497
Harlingen TX	81.8	\$42,643	(\$7,773)	\$34,870

\* Data provided by The Council for Community and Economic Research

## COLI Calculator Result

Based on the Income that you entered, if you are earning \$44,000.00 after tax in Memphis TN, the comparable after-tax income in San Francisco CA is \$83,651.53. Below are the index values and average prices of two areas as well as the national average:

If you move from Memphis TN to San Francisco CA	
Groceries will cost:	30.21% more
Housing will cost:	310.67% more
Utilities will cost:	13.76% more
Transportation will cost:	21.38% more
Health will cost:	17.14% more

### Section 1: Index Values

Category (Percent Weight)	Memphis TN	San Francisco CA	National Average
<b>Composite (100%)</b>	86.0	163.5	100.0
<b>Grocery (13.56%)</b>	93.4	121.6	100.0
<b>Housing (27.02%)</b>	72.0	295.5	100.0
<b>Utilities (10.30%)</b>	84.0	95.6	100.0
<b>Transportation (12.35%)</b>	90.8	110.2	100.0
<b>Health (4.60%)</b>	97.8	114.6	100.0
<b>Miscellaneous (32.17%)</b>	91.8	119.5	100.0

### Section 2 - Average Prices

Item	Memphis TN	San Francisco CA	National Average
<b>T-Bone Steak</b>	\$9.33	\$11.02	\$9.79
<b>Ground Beef</b>	\$3.24	\$3.25	\$3.38
<b>Sausage</b>	\$3.57	\$5.19	\$3.81
<b>Frying Chicken</b>	\$1.01	\$1.48	\$1.21
<b>Chunk Light Tuna</b>	\$0.94	\$1.23	\$0.99
<b>Whole Milk</b>	\$2.29	\$2.28	\$2.26
<b>Eggs</b>	\$1.74	\$1.99	\$1.73
<b>Margarine</b>	\$0.94	\$1.08	\$1.06
<b>Parmesan Cheese</b>	\$3.78	\$5.26	\$3.88
<b>Potatoes</b>	\$3.64	\$3.21	\$3.07
<b>Bananas</b>	\$0.52	\$0.79	\$0.59
<b>Lettuce</b>	\$1.16	\$1.64	\$1.33
<b>Whitebread</b>	\$1.36	\$1.82	\$1.48
<b>Fresh Orange Juice</b>	\$3.35	\$4.24	\$3.35
<b>Coffee</b>	\$4.44	\$6.30	\$4.75
<b>Sugar</b>	\$2.61	\$3.23	\$2.64
<b>Corn Flakes</b>	\$3.36	\$4.50	\$3.57
<b>Sweet Peas</b>	\$0.92	\$1.84	\$1.15
<b>Peaches</b>	\$2.31	\$2.38	\$2.30
<b>Facial Tissues</b>	\$2.02	\$2.13	\$1.90
<b>Detergent</b>	\$4.90	\$6.42	\$5.43
<b>Shortening</b>	\$2.88	\$3.88	\$3.45
<b>Frozen Meal</b>	\$2.26	\$3.30	\$2.56
<b>Frozen Corn</b>	\$1.21	\$2.58	\$1.44
<b>Potato Chips</b>	\$3.19	\$3.62	\$3.67


<b>Soft Drink</b>	\$1.49	\$1.82	\$1.56
<b>Apartment Rent</b>	\$711	\$2,630	\$870
<b>Home Price</b>	\$193,824	\$810,067	\$284,556
<b>Total Energy</b>	\$130.22	\$165.95	\$164.86
<b>Phone</b>	\$25.02	\$23.88	\$27.25
<b>Tire Balance</b>	\$8.27	\$12.70	\$11.16
<b>Gasoline</b>	\$3.40	\$3.84	\$3.52
<b>Optometrist Visit</b>	\$72.18	\$119.28	\$94.52
<b>Doctor Visit</b>	\$76.83	\$127.62	\$98.93
<b>Dentist Visit</b>	\$86.25	\$107.23	\$84.93
<b>Ibuprofen</b>	\$11.10	\$11.36	\$9.40
<b>Lipitor</b>	\$189.31	\$155.66	\$178.23
<b>Hamburger</b>	\$3.36	\$3.88	\$3.53
<b>Pizza</b>	\$10.00	\$8.93	\$8.99
<b>Fried Chicken</b>	\$2.42	\$3.84	\$3.57
<b>Haircut</b>	\$13.20	\$16.79	\$13.66
<b>Beauty Salon</b>	\$25.50	\$62.61	\$33.45
<b>Toothpaste</b>	\$2.24	\$3.15	\$2.52
<b>Shampoo</b>	\$0.94	\$1.09	\$1.00
<b>Dry Cleaning</b>	\$9.18	\$12.12	\$11.01
<b>Man Dress Shirt</b>	\$24.29	\$38.08	\$26.05
<b>Boy Jeans</b>	\$20.06	\$23.24	\$21.91
<b>Women Slacks</b>	\$23.73	\$39.01	\$28.06
<b>Washer Repair</b>	\$52.52	\$61.46	\$65.55
<b>Newspaper</b>	\$20.69	\$44.26	\$16.68
<b>Movie</b>	\$8.93	\$11.17	\$9.19
<b>Bowling</b>	\$3.60	\$6.45	\$4.12
<b>Tennis Balls</b>	\$2.04	\$3.46	\$2.48
<b>Veterinary Services</b>	\$48.67	\$55.18	\$45.53
<b>Beer</b>	\$8.24	\$9.10	\$8.50
<b>Wine</b>	\$9.17	\$6.31	\$7.71



## Supplemental Nutrition Assistance Program: Examining the Evidence to Define Benefit Adequacy

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Julie A. Caswell and Ann L. Yaktine, Editors; Committee on Examination of the Adequacy of Food Resources and SNAP Allotments; Food and Nutrition Board; Committee on National Statistics; Institute of Medicine and National Research Council

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## Summary

For many Americans who live at or below the poverty threshold, access to healthy foods at a reasonable price is a challenge that often places a strain on already limited resources and may compel them to make food choices that are contrary to current nutritional guidance. To help alleviate this problem, the U.S. Department of Agriculture (USDA) administers a number of nutrition assistance programs designed to improve access to healthy foods for low-income individuals and households. The largest of these programs is the Supplemental Nutrition Assistance Program (SNAP), formerly called the Food Stamp Program, which today serves more than 46 million Americans with a program cost in excess of \$75 billion annually. The goals of SNAP include raising the level of nutrition among low-income households and maintaining adequate levels of nutrition by increasing the food purchasing power of low-income families.

Households receive the maximum SNAP benefit if the family has no net income to contribute to food purchases; households with income combine the SNAP allotment with other household resources. Currently there is debate about whether there are different ways to think about the adequacy of the SNAP allotment. Factors such as time needed to purchase and prepare foods from basic ingredients as described in the Thrifty Food Plan (TFP), the basis for calculating the SNAP allotment, knowledge and skills needed to plan and prepare healthy meals, the diversity of cultural preferences, food access constraints, and regional/seasonal price fluctuations all may have an impact on the adequacy of SNAP allotments for achieving the program goals. In addition to these individual, household, and environmental factors, program characteristics—the way the allotments are calculated (including the maximum benefit guarantee, the benefit reduction rate, and the calculation of net income deductions)—are important to consider in defining adequate allotments. The committee reviewed the evidence for the impact of these factors and characteristics on the purchasing power of SNAP allotments and assessed their role in contributing to the feasibility of defining allotment adequacy.

### STUDY TASK AND APPROACH

In response to questions about whether there are different ways to define the adequacy of SNAP allotments consistent with the program goals of improving food security and access to a healthy diet, USDA's Food and Nutrition Service (FNS) asked the Institute of Medicine (IOM) to conduct a study to examine the feasibility of defining the adequacy of SNAP allotments, specifically:

- the feasibility of establishing an objective, evidence-based, science-driven definition of the adequacy of SNAP allotments consistent with the program goals of improving food security and access to a healthy diet, as well as other relevant dimensions of adequacy; and

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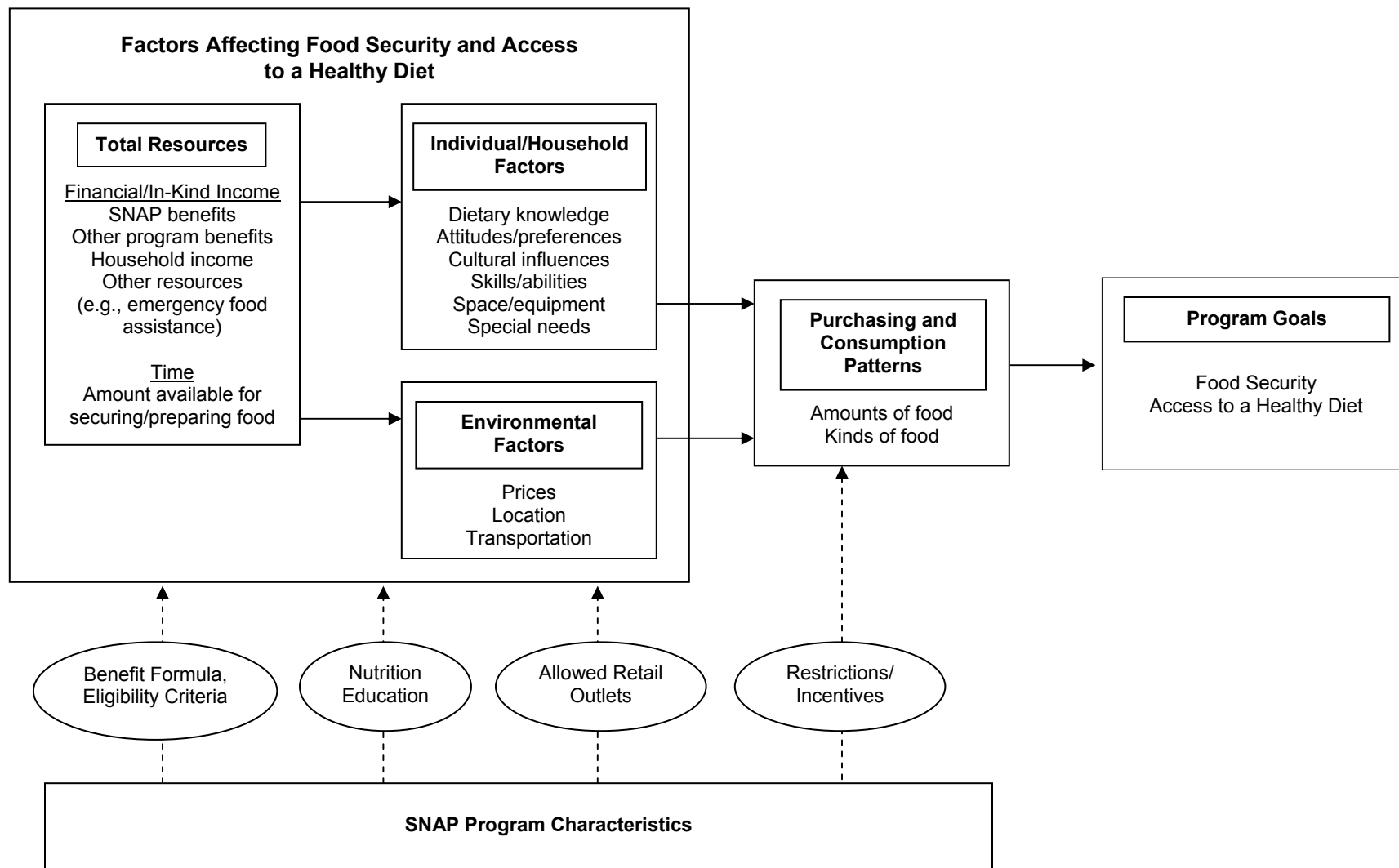
S-1

- data and analyses needed to support an evidence-based assessment of the adequacy of SNAP allotments.

In addressing its task, the committee considered questions posed by the sponsor with respect to the above two primary dimensions of the task. These questions provided further guidance for the committee's review of the evidence. Appendix E outlines these additional questions and indicates where they are addressed in the report.

The committee conducted a comprehensive review of the current evidence, including the peer-reviewed published literature and peer-reviewed government reports. Although not given equal weight with peer-reviewed publications, some non-peer-reviewed publications from nongovernmental organizations and stakeholder groups also were considered because they provided additional insight into the behavioral aspects of participation in nutrition assistance programs. In addition to its evidence review, the committee held a data gathering workshop that tapped a range of expertise relevant to its task.

To examine the feasibility of defining the adequacy of SNAP allotments, the committee constructed a framework (Figure S-1) depicting the process by which SNAP households may or may not meet program goals. To define the components of the framework and establish the boundaries of its evidence review, the committee focused on the two dimensions of its task—the feasibility of objectively defining SNAP benefit adequacy consistent with improving food security and access to a healthy diet, and data and analyses needed to support an objective, evidence-based assessment of benefit adequacy. The committee's framework describes how the SNAP program fits into a household's overall process of acquiring and providing food for all family members. It consists of three major parts: (1) the program goals of food security and access to a healthy diet; (2) total resources, individual/household factors, and environmental factors that influence the process through which households purchase and consume foods; and (3) elements of the SNAP program characteristics that interact with the process through which households may achieve program goals.



**FIGURE S-1** Framework for determining the feasibility of defining the adequacy of SNAP allotments.

NOTE: Solid lines represent the food purchasing and consumption process for households participating in SNAP, independent of the program. Dashed lines represent the influence of SNAP program characteristics on this process.

## CONCLUSIONS AND RECOMMENDATIONS

### Conclusions

The committee's conclusions are based on the findings derived from its review of the available evidence. These conclusions formed the basis for the committee's recommendations.

#### *Conclusion 1: The Adequacy of SNAP Allotments Can Be Defined*

Based on the available evidence, it is feasible to define objectively the adequacy of SNAP allotments. Doing so entails identifying the factors that affect the ability of participants to attain food security and access to a healthy diet. The committee's review of the evidence found that it is possible to identify those factors, and the committee has done so in its framework and in the following two conclusions and the findings that supports them. The available evidence has some limitations, but it is possible to obtain the evidence needed for a science-driven definition of allotment adequacy. First, evidence must be taken into account on the degree to which specific individual, household, and environmental factors influence SNAP participants' purchasing power, given a dollar value of their SNAP benefits. Second, evidence must be taken into account on the impacts of factors related to the computation of the dollar value of the SNAP allotment itself, as well as other SNAP program characteristics.

#### *Conclusion 2: The Adequacy of SNAP Allotments Is Influenced by Individual, Household, and Environmental Factors*

Evidence obtained by the committee in its data gathering workshop and in its review and assessment of the literature revealed that the opportunity for SNAP participants to meet the program goals, given a dollar value of their SNAP benefits, is influenced by a number of individual, household, and environmental factors that impact the purchasing power of the allotments. The committee found that a definition of the adequacy of SNAP allotments must account for these factors according to the magnitude and significance of their influence on the allotment's purchasing power. Although SNAP allotments might be adequate in the absence of these factors, the evidence suggests that these factors can act as barriers to obtaining nutritious foods and preparing nutritious meals consistent with the assumptions of the Thrifty Food Plan (TFP). The evidence on individual, household, and environmental factors that constrain the purchasing power of SNAP allotments is most robust for four factors:

- The SNAP allotment, which is based on the TFP, assumes the purchase of many basic, inexpensive, unprocessed foods and ingredients requiring substantial investment of participants' time to produce nutritious meals. The evidence shows that the time requirements implicitly assumed by the TFP are inconsistent with the time available for most households at all income levels, particularly those with a single working head. By failing to account for the fact that SNAP participants, like other households, need to purchase value-added foods that save preparation time, the current value of the SNAP allotment substantially limits the flexibility and purchasing power of SNAP benefits.
- The food prices faced by SNAP participants vary substantially across geographic regions of the country and between rural and urban areas. However, SNAP benefits are adjusted

only for Alaska and Hawaii. SNAP participants in locales with higher food prices are likely to find it more difficult than those in areas with lower prices to purchase the types and amounts of foods specified in the TFP as adequate to meet their needs for a nutritious diet. The evidence points further to a lack of data on the extent to which food prices influence the ability of SNAP participants to purchase nutritious foods.

- There is evidence that low-income households face higher transaction costs in achieving food security and access to a healthy diet relative to higher-income households. For example, low-income and minority populations are more likely than other groups to experience limited access to supermarkets and other large retail outlets, such as big-box stores, that offer a broad range of nutritious foods at reasonable cost. Individuals without access to such venues experience greater disparity in the availability of healthy foods, such as fresh fruits and vegetables, in their neighborhood food outlets. In addition, a lack of transportation infrastructure commonly leads to limited food access in small towns and rural areas.
- Nutrition education programs for low-income participants that include training in food purchasing and preparation skills appear to have some effectiveness in changing behavioral outcomes. This finding lends credence to the theory that skills are a limiting factor in the ability of some SNAP participants to maximize the purchasing power of the current SNAP allotments. However, existing evidence on the influence of nutrition knowledge and skills on the ability of SNAP participants to purchase and prepare nutritious foods consistent with the assumptions of the TFP is insufficient to support a conclusion about the relevance of these factors to an evidence-based definition of the adequacy of SNAP allotments.

*Conclusion 3: The Adequacy of SNAP Allotments Is Influenced by Program Characteristics*

The evidence suggests that a number of factors related to how the dollar value of SNAP allotments is calculated, as well as other SNAP program characteristics, can influence the feasibility of defining an adequate SNAP allotment. The evidence supports the conclusion that the maximum monthly benefit, the benefit reduction rate, and the net income calculation have important impacts on the definition of the adequacy of SNAP allotments.

- **Maximum benefit guarantee**—The maximum SNAP benefit, currently based on assumptions of the TFP plus the temporary upward adjustment that occurred under the American Recovery and Reinvestment Act (ARRA) of 2009, may not always be sufficient to allow participants to purchase the food components and prepare the meals specified by the TFP for several reasons. As noted above, the time available for most households at all income levels, particularly those with a single working head, is insufficient to meet the assumptions of the TFP, and thus the allotments do not sufficiently account for the costs of purchasing foods that must be further prepared. Also as noted above, the TFP does not account for many types of geographic price variation. In addition, limited evidence suggests that some SNAP households with no net income as defined under the program and residing in high-cost locales with limited access to food outlets are unable to purchase the foods included in the market basket underlying the TFP. Although the committee found compelling evidence on the time costs of meal preparation and on geographic price variations, the evidence on how best to incorporate

these factors into the SNAP benefit formula is less compelling. The committee also identified as an issue affecting the adequacy of SNAP allotments the fact that the annual maximum benefit update occurs following a 16-month lag. The June cost of food is used to update the TFP in October, but then is not updated again until the following October, 16 months later. Because of the impact of inflation and other factors on food prices, this lag in the benefit adjustment can significantly reduce the purchasing power of SNAP allotments.

- **Benefit reduction rate**—The original assumption underlying the benefit reduction rate is that the average U.S. household spends 30 percent of its income on food. This assumption is outdated and inconsistent with the current average spending pattern across income levels in the United States of about 13 percent of pretax income spent on purchases of all food consumed, both at home and away. Although lower-income households spend a greater portion of their income on food (e.g., 16.8 percent in 2010) compared with higher-income households (e.g., 11.7 percent in 2010), the percentage is still substantially less than the 30 percent assumption currently used or the lower effective benefit reduction rate that results after other parts of the benefit formula have been applied. Evidence suggests that a lower benefit reduction rate more closely aligned with current household spending patterns would likely give households greater incentive to combine workforce participation with the receipt of SNAP benefits by reducing the penalty for working.
- **Calculation of net income deduction**—The committee found evidence that several program characteristics used to determine net income and the monthly allotment may not adequately capture the impact of additional extraordinary household costs that reduce the allotment's purchasing power. Regarding the shelter deduction, considerable evidence shows that a substantial proportion of SNAP households face housing costs in excess of the current cap on the shelter deduction, which results in overestimation of the net income participants have available to purchase food. Deductions allowed for medical expenses for persons 60 and older and the disabled may influence the purchasing power of the allotment for those individuals but do not address out-of-pocket medical costs for nonelderly, nondisabled participants, although more evidence is needed to understand the impact of such expenses on the adequacy of the SNAP allotment. Evidence is more limited on whether the current 20 percent earned income deduction is adequate to cover the additional expenses incurred by SNAP recipients who work.

### Recommendations

The committee offers its recommendations in three areas. First, it recommends elements that should be included by USDA-FNS in an evidence-based, objective definition and measurement of the adequacy of SNAP allotments. Second, it recommends monitoring and assessment of the adequacy of SNAP allotments that is needed for evaluation and adjustment over time. Third, it recommends additional research and data needed to support an evidence-based definition of allotment adequacy. In addition, the committee describes other research considerations that would further understanding of allotment adequacy. Specific data and analytical challenges to the primary research effort are identified at the conclusion of Chapters 3 and 4.

*Defining and Measuring the Adequacy of SNAP Allotments*

To define the adequacy of SNAP allotments objectively using currently available evidence requires consideration of a range of factors identified by the committee as likely to have an impact on the allotments' purchasing power. As a first step, the committee established a framework for considering factors that can have an impact on defining allotment adequacy. With this in mind, the committee offers the following recommendations.

**Recommendation 1: In defining allotment adequacy, the U.S. Department of Agriculture (USDA) Food and Nutrition Service (FNS) should include consideration of the influence of specific individual, household, and environmental factors on Supplemental Nutrition Assistance Program (SNAP) participants' purchasing power given the dollar value of their SNAP benefits. Specific individual, household, and environmental factors to consider in a definition of the adequacy of SNAP allotments are:**

- ***Time***—USDA-FNS should recognize the cost-time trade-offs involved in procuring and preparing a nutritious diet. The dollar value of the Thrifty Food Plan (TFP), with its strong reliance on preparation of meals from basic ingredients, does not account for time constraints faced by most households at all income levels, particularly those with a single working head of household, which necessitate purchasing value-added or prepared foods with a higher cost. USDA-FNS should examine the impact of accounting for cost-time trade-offs, for example, by:
  - applying a time adjustment multiplier to the cost of the TFP or reviewing options for adjustments to the current cost of the plan, and
  - adjusting the earned income deduction to reflect more accurately time pressures for participants who are working.
- ***Geographic price variation***—USDA-FNS should recognize the substantial variation in food prices that exists across geographic regions of the contiguous United States and between rural and urban areas. USDA-FNS should examine possible approaches to accounting for this variation, such as through adjustments to the maximum benefit that take into account:
  - pricing or price adjustments for food in high-cost (including urban and rural areas) as well as low-cost regions;
  - whether the shelter cap should be increased, particularly in high-cost regions; and
  - alternatives to the TFP, such as the Low-Cost Food Plan.
- ***Access to food outlets***—USDA-FNS should assess the impact of limited access to certain food outlets (e.g., supermarkets) that may affect the ability of some SNAP participants to purchase a variety of healthy foods at reasonable cost. Evaluation and assessment of access barriers should include the degree to which, and for whom, they constrain the SNAP allotment that would otherwise be adequate to meet the program goals.

**Recommendation 2:** In defining allotment adequacy, U.S. Department of Agriculture (USDA) Food and Nutrition Service (FNS) should also consider evaluating specific program characteristics that affect the allotment’s actual dollar value, as well as the extent to which the allotment is targeted to individual Supplemental Nutrition Assistance Program (SNAP) participants. Specific program characteristics to consider in a definition of allotment adequacy are:

- **Maximum benefit guarantee**—USDA-FNS should evaluate the need to:
  - adjust the current timing scheme for the cost-of-living adjustment to the Thrifty Food Plan (TFP) to reduce the 16-month lag in updates;
  - update adjustments for economies of scale to reflect current data on the impact of family size on family food spending; and
  - correct for misalignment in the assumptions of the TFP that serve as the basis for determining the maximum benefit guarantee to account for current lifestyle and meal patterns that include the purchase of food products that reduce the need for in-home preparation time.
- **Benefit reduction rate**—USDA-FNS should evaluate whether there is a need to adjust downward the current benefit reduction rate, which is currently set at 30 percent but has a lower effective rate, to reflect the current purchasing behaviors of U.S. households.
- **Calculation of net income**—USDA-FNS should evaluate whether there is a need to adjust the design of the net income calculation to better reflect the ability of SNAP participants to purchase food within the boundaries of their incomes. Particular attention should be given to the adequacy of the current earned income deduction; the cap on the excess shelter deduction; and the possibility of expanding the out-of-pocket medical deduction to nonelderly, nondisabled populations.

#### *Monitoring Assessment of the Adequacy of SNAP Allotments*

The committee’s findings suggest that an evidence-based definition of the adequacy of SNAP allotments requires ongoing monitoring of the ability of SNAP participants to use the allotments to achieve the program goals. To this end, it is important to know the proportion of SNAP participants that are more food secure and consuming healthier diets as a result of the program, and within what time frame. Understanding the impacts of SNAP benefits on these outcomes would contribute to the broader knowledge base used to define the adequacy of SNAP allotments.

**Recommendation 3:** To assess the correspondence between the definition of an adequate Supplemental Nutrition Assistance Program (SNAP) allotment and the attainment of the program goals, and to adjust the definition of adequacy as information on influencing factors evolves, U.S. Department of Agriculture (USDA) Food and Nutrition Service (FNS) should:

- **Develop longitudinal data sets containing appropriate measures of food insecurity, access to a healthy diet, and SNAP participation as part of the evidence base it uses to define adequacy.**
- **Assess existing and establish new evaluation protocols that can measure the impact of SNAP participation on food security and access to a healthy diet, accounting for selection biases (e.g., that SNAP participants may be more likely to be food insecure than the general low-income population).**
- **Evaluate additional nutrition monitoring tools, including a standardized measurement tool with which to monitor and assess the ability of SNAP allotments to support a dietary pattern consistent with the *Dietary Guidelines for Americans*. The committee identified the Healthy Eating Index as one example of a measure that could be adapted to assess whether SNAP participants are meeting recommended dietary goals.**

#### *Meeting Additional Research Needs*

The committee identified several factors related to SNAP program participation that may affect whether some SNAP participants are able to meet the program goals and for which evidence is currently inadequate to fully assess their importance. These factors may affect either directly or indirectly the definition of the adequacy of SNAP allotments. The two broad areas in which additional research is needed to further develop the knowledge base for the potential use of these factors in defining allotment adequacy are educational programs that can help participants increase the purchasing power of the SNAP allotment and access to retail outlets and foods.

**Recommendation 4: U.S. Department of Agriculture (USDA) Food and Nutrition Service (FNS) should conduct further research in the following areas to support the definition of allotment adequacy:**

- **To better assess how participants' understanding of nutrition and resource management skills affect the adequacy of Supplemental Nutrition Assistance Program (SNAP) allotments, USDA-FNS should:**
  - **assess whether and how strengthening the quality (content and delivery mechanisms) of education in nutrition and resource management skills can support allotment adequacy, for example, through educational outreach such as demonstration projects, and evaluate the level of funding needed to support such programs; and**
  - **assess how effectively these educational programs align with the needs of SNAP participants and the program's potential to enhance the purchasing power of SNAP allotments.**
- **To evaluate the impact of access to retail outlets on the opportunity for SNAP participants to be food secure and to make nutritious food choices, USDA-FNS should conduct periodic regional cross-sectional surveys to gather information on the cost and availability of foods that**

**are consistent with the recommendations of the *Dietary Guidelines for Americans*.**

### **FINAL THOUGHTS**

The committee reviewed a range of evidence applicable to the feasibility of defining the adequacy of SNAP benefits in terms of whether the SNAP allotment enables program participants to meet program goals, given their benefit allotment, not whether all participants will in fact reach these goals. The committee's recommendations are structured to assist USDA-FNS in establishing an objective definition of the adequacy of the SNAP allotment, taking the evidence for these factors into consideration, and to identify specific data and analysis requirements to support an evidence-based assessment of allotment adequacy.