

DATE: February 1, 2024

SUBJECT: Supplemental Nutrition Assistance Program (SNAP) – Fiscal Year 2025 Priority

Areas for State Outreach Plans

TO: All SNAP State Agencies

The Food and Nutrition Service (FNS) is committed to increasing access to the Supplemental Nutrition Assistance Program (SNAP), one of the most powerful tools available to ensure low-income people have access to healthy food. Program informational activities, or SNAP outreach activities, are a critical tool to ensure vulnerable populations are aware of the availability, eligibility requirements, application procedures, and benefits of SNAP.

FNS strongly recommends that all States agencies develop a SNAP outreach plan. In addition to increasing enrollment among eligible non-participating households, SNAP outreach can help reduce churn by encouraging existing SNAP households to recertify. Outreach work is especially important now for State agencies to reach households who need additional support after the end of flexibilities that were in place during the COVID-19 Federal public health emergency (PHE) as well as populations impacted by new provisions in the Fiscal Responsibility Act (FRA).

Outreach is also critical to achieving the goals of the National Strategy on Hunger, Nutrition, and Health.¹ The first pillar of the strategy calls for improving food access and affordability and connecting more underserved populations to SNAP. FNS remains committed to advancing racial equity and reducing barriers to SNAP participation.

¹ White House, "Biden-Harris Administration National Strategy on Hunger, Nutrition, and Health," September 2022, https://www.whitehouse.gov/wp-content/uploads/2022/09/White-House-National-Strategy-on-Hunger-Nutrition-and-Health-FINAL.pdf.

FNS recommends incorporating outreach activities to serve communities of color that may not be well-served by existing outreach partners.² As part of this effort, FNS urges State agencies to strengthen partnerships in the following Fiscal Year (FY) 2025 SNAP outreach priority areas:

- Individuals impacted by new Able-Bodied Adults without Dependents (ABAWD) policies under the FRA: Outreach can be critical in sharing how the new ABAWD time limit policies and exceptions will impact certain populations. Individuals experiencing homelessness, veterans, and individuals 24 years or younger who were in foster care at age 18 are now not subject to the time limit under the new ABAWD time limit exceptions. Persons aged 50-54 may become subject to ABAWD time limits, and outreach can help inform them of other exceptions they may be eligible for to avoid losing benefits.
 - O FNS recommends that State agencies and outreach partners provide plain language, client-friendly materials on the new FRA requirements and exemptions. FNS also recommends that State agencies partner with local organizations serving these groups, such as homeless shelters, local Veterans Health Administration (VHA) facilities and veterans service organizations, foster care agencies, and workforce agencies.
- Older adults (individuals aged 60 and above) and persons with disabilities. Helping
 populations receive deductions like the medical expense deduction is important to
 ensuring households receive maximum benefit levels they are eligible for.

² For more information on underserved communities, see the White House Strategy on Hunger, Nutrition, and Health and Executive Order 13985, "Advancing Racial Equity and Support for Underserved Communities Through the Federal Government."

- o FNS encourages State agencies develop outreach materials and staff refresher training focused on how to claim deductions and to partner with local agencies that reach older adults and persons with disabilities to assist in tailored outreach, such as helping submit verification documents. Partners could include services agencies, such as Aging and Disability Resource Centers, Area Agencies on Aging, and community-based organizations supporting older adults and persons with disabilities. FNS also encourages outreach to kinship caregivers (e.g., grand families).
- <u>Students.</u> With the end of the temporary PHE student exemptions, providing clear information about student eligibility remains especially important.
 - o FNS encourages State agencies to partner with institutions of higher education (IHEs) to support student enrollment in SNAP. IHEs may use data from the Federal Application for Student Aid (FAFSA*) to communicate (e.g., text, email) with potentially eligible students. Students can then apply for SNAP benefits online, in-person, by phone, or by mail. IHEs may also partner with the State agency to streamline the enrollment and verification process provided certain conditions are met. Per U.S. Department of Education guidance,³ IHEs are permitted to use FAFSA data to aid in the administration of certain Federal benefits, including SNAP, provided that the IHE obtained the students' prior written consent in compliance with the requirements of 34 C.F.R. § 99.30 of the Family Educational Rights and Privacy Act regulations and protects their privacy rights. State agencies may also choose to partner with State

³ Federal Student Aid, U.S. Department of Education, "(GEN-22-02) Use of FAFSA Data to Administer Federal Programs," January 2022, https://fsapartners.ed.gov/knowledge-center/library/dear-colleague-letters/2022-01-20/use-fafsa-data-administer-federal-programs.

departments of higher education and other higher education stakeholders to facilitate forming these partnerships with IHEs and to share best practices.⁴

- Immigrant and mixed status households. Eligible non-citizen families face a range of barriers to SNAP participation, including fear that applying for or receiving SNAP benefits could affect immigration status, language or literacy barriers, and overall lack of information or misinformation about SNAP availability or rules.
 - FNS encourages State agencies to collaborate with partners serving immigrant populations and increase access to translated outreach materials to help mitigate these barriers.

FNS encourages State agencies to carefully consider one or more of these priority areas and strategies when analyzing State agency needs and developing FY 2025 outreach plans. Detailed information about outreach plan requirements and allowable activities may be found in the SNAP State Outreach Plan Guidance. As a reminder, FNS reimburses State agencies for up to 50 percent of allowable administrative costs, including outreach activities. State agencies must have an approved outreach plan for activities to be eligible for reimbursement.

State agencies should submit outreach plans to their FNS Regional Office by August 15, 2024. However, FNS encourages State agencies to submit the plans earlier, when possible, to allow sufficient time for review and approval.

⁴ For more information on students and SNAP, visit SNAP's <u>Students webpage</u>.

⁵ Federal Register, "Advancing Racial Equity and Support for Underserved Communities Through the Federal Government," Vol. 86, No. 14, Presidential Documents, January 25, 2021, https://www.govinfo.gov/content/pkg/FR-2021-01-25/pdf/2021-01753.pdf.

Thank you for your efforts to improve access to SNAP for all eligible participants. State agencies with questions should contact their respective FNS Regional Office representatives.

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Supplemental Nutrition Assistance Program