



A View of the Farm Bill Through Policy Design, Part 3: SNAP

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Having enacted a bill to suspend the debt limit and avoid default, Congress can now proceed with other items on its agenda and that could include farm bill reauthorization. This article continues the multi-part series presenting a view of the Farm Bill through the perspective of policy design. The discussion reviews the Supplemental Nutrition Assistance Program (SNAP) reauthorized in Title IV of the Agricultural Improvement Act of 2018. SNAP is the subject of intense partisan focus, largely due to the amount of annual spending for the program (*farmdoc daily*, [April 20, 2023](#); [April 27, 2023](#)). The Congressional Budget Office projects that SNAP will spend almost \$1.2 trillion in the baseline, or approximately \$120 billion per year for ten fiscal years (FY) from FY2024 to FY2033 (*farmdoc daily*, [February 23, 2023](#); CBO, [February 2023](#); CBO, [May 2023](#)). In FY2022, USDA’s Food and Nutrition Service (FNS) reported \$119 billion in total program costs, \$113.9 billion of which was for benefits, to provide assistance to a monthly average of 41.2 million Americans (USDA, FNS SNAP Data Tables: [National Level Annual Summary](#)).

Background

The articles in this series will explore the major mandatory titles, policies, and programs in the Farm Bill, as well as updates on the Policy Design Lab project (*farmdoc daily*, [April 13, 2023](#); [May 11, 2023](#)). A work-in-progress, the Policy Design Lab provides a web-based resource in which to explore and analyze existing policies and policy alternatives, working from statutory and legislative text to incorporate and apply research, publicly available data, and computational resources for analysis and visualization efforts; research and data guided by statutory provisions or legislative options to produce comparative analysis. One goal will be to advance understanding about existing policy outcomes, as well as research-backed potential outcomes of alternative designs. Eventually, it will also seek to improve understanding of the policymaking process and facilitate open discussions about policy options. For each of the major mandatory farm bill programs, the status quo will be visualized through maps and charts of the distribution of benefits and payments by State. This installment explores the policies and spending of the Supplemental Nutrition Assistance Program (SNAP).

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Discussion

By any measure, SNAP is the largest program in the Farm Bill. It constitutes nearly 85% of the projected spending or baseline, while also serving a constituency that is more than 20 times that of farm programs or crop insurance. In the statute, SNAP is housed in chapter 51 of Title 7, which is the Agriculture Title of the U.S. Code. As noted above, most of the spending on SNAP is for benefits and that spending effectively is the function of two provisions: (1) eligibility provisions that provide for participation in the program; and (2) benefit calculations that provide for the amount received by participants.

Figure 1 contains excerpts from the SNAP statutory compilation for determining household eligibility (Senate ANF, Compilations: [Food and Nutrition Act of 2008](#)). Two provisions are highlighted: what is known as categorical eligibility, in which a household is eligible for SNAP because they are also eligible for other federal low-income assistance programs; and the income standards for households, generally understood as gross monthly household income at or below 130% of the federal poverty level ([7 U.S.C. §2014](#)). In addition, household net monthly income must be at or below 100% of the federal poverty level (CRS, [October 4, 2022](#)).

Figure 1. Supplemental Nutrition Assistance Program, Statutory Excerpts; Eligible Households

ELIGIBLE HOUSEHOLDS

SEC. 5. [7 U.S.C. 2014] (a) Participation in the supplemental nutrition assistance program shall be limited to those households whose incomes and other financial resources, held singly or in joint ownership, are determined to be a substantial limiting factor in permitting them to obtain a more nutritious diet. Notwithstanding any other provisions of this Act except subsections (b), (d)(2), (g), and (r) of section 6 and section 3(m)(4), households in which each member receives benefits under a State program funded under part A of title IV of the Social Security Act (42 U.S.C. 601 et seq.), supplemental security income benefits under title XVI of the Social Security Act [(42 U.S.C. 1381 et seq.)], or aid to the aged, blind, or disabled under title I, X, XIV, or XVI of the Social Security Act, shall be eligible to participate in the supplemental nutrition assistance program. Except for sections 6, 16(e)(1), and section 3(m)(4), households in which each member receives benefits under a State or local general assistance program that complies with standards established by the Secretary for ensuring that the program is based on income criteria comparable to or more restrictive than those under subsection (c)(2), and not limited to one-time emergency payments that cannot be provided for more than one consecutive month, shall be eligible to participate in the supplemental nutrition assistance program. Assistance under this program shall be furnished to all eligible households who make application for such participation.

(c) The income standards of eligibility shall be adjusted each October 1 and shall provide that a household shall be ineligible to participate in the supplemental nutrition assistance program if—

(1) the household's income (after the exclusions and deductions provided for in subsections (d) and (e)) exceeds the poverty line, as defined in section 673(2) of the Community Services Block Grant Act (42 U.S.C. 9902(2)), for the forty-eight contiguous States and the District of Columbia, Alaska, Hawaii, the Virgin Islands of the United States, and Guam, respectively; and

(2) in the case of a household that does not include an elderly or disabled member, the household's income (after the exclusions provided for in subsection (d) but before the deductions provided for in subsection (e)) exceeds such poverty line by more than 30 per centum.

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Benefits to eligible households are determined based by calculations through the thrifty food plan and can only be used to purchase food ([7 U.S.C. §2017](#)). The definition of the thrifty food plan is based on diet needs for a household of four using current food prices, food composition data, consumption patterns and dietary guidelines ([7 U.S.C. §2012](#)). USDA FNS reported that the average benefit per participating person each month was just over \$230 in FY 2022—that would amount to less than \$8 per day, or about \$2.50 per meal. CBO projects the average monthly benefit per participating person to be \$222 in FY2023 and increase to \$265 by FY2033. As noted above, most of the costs of SNAP are from benefits, which is largely a function of the number of people receiving assistance and the amount of that assistance. For example, \$222 per person for 41.2 million persons in FY2022 comes out to approximately \$9.5 billion per month in benefits, nearly \$114 billion for the year. The remaining \$5 billion would be operational costs of the program, including things like employment and training efforts.

As discussed previously, the debt limit negotiations included changes to the work requirements for SNAP. In the statute, the work requirements provisions are contained within the section for eligibility disqualifications ([7 U.S.C. §2015](#)). Figure 2 provides the work requirements excerpts from the statute; note, however, that these provisions have yet to be updated due to enactment of the debt limit bill. Little about the debate over revising work requirements, nor the final changes to the program, answered the most significant question about this policy: since the 2008 financial crisis, there has been a clear

divergence between SNAP participation and unemployment, likely indicating that many people are employed but still falling below poverty measures (*farmdoc daily*, April 20, 2023).

Figure 2. Supplemental Nutrition Assistance Program, Statutory Excerpts; Work Requirements

CHAPTER 51—SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM (SNAP)
2036d)

CHAPTER 51—Front Matter
 Sec. 2011. Congressional findings
 Sec. 2012. Definitions
 Sec. 2012a. Publicly operated establishments
 Sec. 2013. Establishment of a SNAP program
 Sec. 2014. Eligible households
 Sec. 2014a. Notice of change in household composition
 Sec. 2015. Eligibility determination
 Sec. 2016. Issuance and renewal of SNAP benefits
 Sec. 2016a. EBT benefit card
 Sec. 2017. Value of allotment
 Sec. 2018. Approval of replacement SNAP benefits
 Sec. 2019. Redemption of SNAP benefits
 Sec. 2020. Administrative procedures
 Sec. 2021. Civil penalties
 Sec. 2022. Disposition of SNAP benefits
 Sec. 2023. Administrative review
 Sec. 2024. Violations and sanctions
 Sec. 2025. Administrative review of SNAP benefits
 Sec. 2026. Research, development, and demonstration projects
 Sec. 2026a. Healthy food and nutrition assistance

(d) Conditions of participation

(1) WORK REQUIREMENTS.-

(A) IN GENERAL.-No physically and mentally fit individual over the age of 15 and under the age of 60 shall be eligible to participate in the supplemental nutrition assistance program if the individual-

(i) refuses, at the time of application and every 12 months thereafter, to register for employment in a manner prescribed by the Secretary;

(ii) refuses without good cause to participate in an employment and training program established under paragraph (4), to the extent required by the State agency;

(iii) refuses without good cause to accept an offer of employment, at a site or plant not subject to a strike or lockout at the time of the refusal, at a wage not less than the higher of-

(I) the applicable Federal or State minimum wage; or

(II) 80 percent of the wage that would have governed had the minimum hourly rate under section 6(a)(1) of the Fair Labor Standards Act of 1938 (29 U.S.C. 206(a)(1)) been applicable to the offer of employment;

(iv) refuses without good cause to provide a State agency with sufficient information to allow the State agency to determine the employment status or the job availability of the individual;

(v) voluntarily and without good cause-

(I) quits a job; or

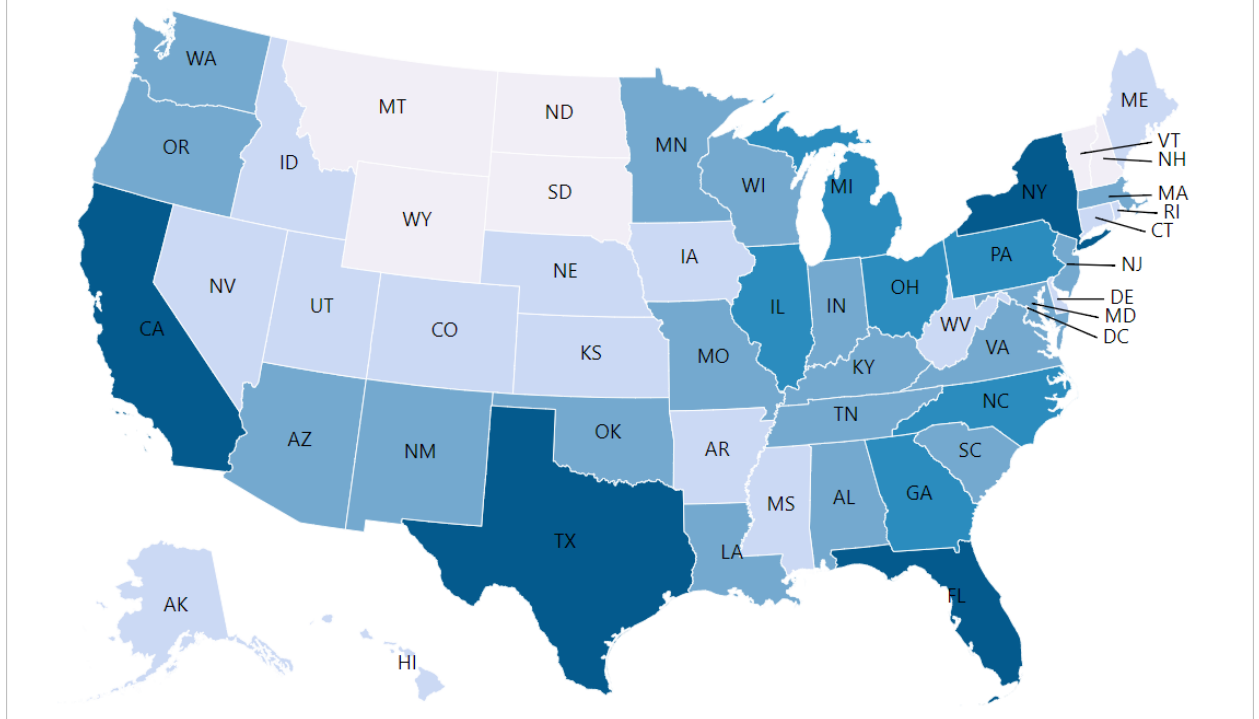
(II) reduces work effort and, after the reduction, the individual is working less than 30 hours per week; or

(vi) fails to comply with section 2029 of this title.

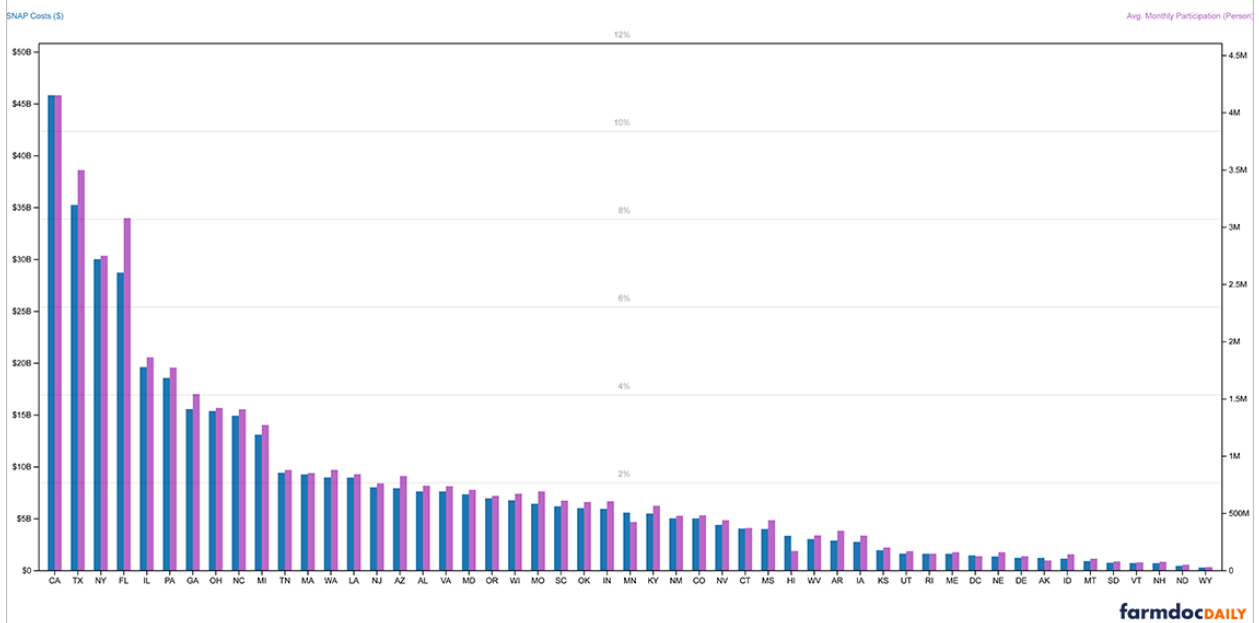
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Figure 3 presents an interactive map for SNAP based on the total costs by State for FY 2018 to FY 2022. The map also presents the average monthly participation for the State in those years. For example, SNAP spent a total of \$19.6 billion in Illinois in those years and the monthly average participation was nearly 1.9 million people. Scrolling further down is an interactive chart that provides each state's spending and participation, as well as the percentage of the national total, ranking the states from most (California: \$45.8 billion; 4.15 million people) to least (Wyoming: \$265 million; 28,000 people). The chart can be converted to a table as well. Also note that in the legend above the map, the color bars are different lengths representing the number of states within each category of costs; most states, by this estimate, receive between \$5 billion and \$10 billion in SNAP spending from FY 2018 to FY 2022.

Figure 3. Total Supplemental Nutrition Assistance Program (SNAP) Costs from 2018 - 2022



Comparison by States



Concluding Thoughts

The words of statutes put policies in action, including determining the distribution of benefits. The Supplemental Nutrition Assistance Program (SNAP) reviewed in this article also provides a good example of program complexity; the many cross-statutory references in the eligibility provisions for one, as well as the provisions for work requirements that can operate to disqualify people from participation. SNAP also provides another example and an important reminder about a fundamental reality of policy: on the other end of the statutory words, the USDA data, and the Congressional Budget Office spending projections

are real people. In the case of SNAP, these are people with incomes below basic poverty measures and households struggling to put food on the table. In the United States today, with historically low unemployment there are on average more than 41 million Americans each month who qualify and receive assistance from this program. If the primary view of the program is through the CBO projections, that view is circumscribed by a bottom-line projection of \$120 billion each year and \$1.2 trillion over ten years; at the level of the individual getting help to buy food, the program provides about \$8 each day and \$230 each month. Reducing the costs of the program to any significant degree requires reducing the number of people who can receive assistance. For those individuals and households, losing this modicum of assistance does not help them with the struggles of poverty, it only magnifies them. Moreover, spending projections ten years into an unknown future are not reality, but losing assistance to buy food is a difficult reality on a daily basis. It is the juxtaposition of these two perspectives that defines much of the politics of SNAP—and through SNAP for any farm bill reauthorization—but also causes those politics to become pointed and challenging. Reviewing the program's parameters and its distribution of benefits and participation also provides important political context. A Policy Design Lab being developed at the University of Illinois is working to apply research, data, computational resources, and statutory or legislative textual analysis to visualize policy design, with a goal of adding further context and perspective to challenging public policy matters.

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