



Supplemental Nutrition Assistance Program (SNAP): A Primer on Eligibility and Benefits

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January 9, 2013

Congressional Research Service

7-5700

www.crs.gov

R42505

Summary

The Supplemental Nutrition Assistance Program (SNAP), formerly called the Food Stamp Program, is designed primarily to increase the food purchasing power of eligible low-income households to help them buy a nutritionally adequate low-cost diet. This report describes the rules related to eligibility for SNAP benefits as well as the rules for benefits and their redemption. SNAP is administered by the U.S. Department of Agriculture's Food and Nutrition Service (USDA-FNS). SNAP is authorized by the Food and Nutrition Act of 2008. This law, formerly the Food Stamp Act of 1977, has since 1973 been reauthorized by the "farm bill," omnibus legislation that also typically includes the authorization of other federal agricultural policies and programs.

SNAP eligibility and benefits are calculated on a household basis. Eligibility is determined through a traditional or a categorical eligibility path. Under *traditional* eligibility, applicant households must meet gross income, net income, and asset tests. Specifically, household gross monthly income (all income as defined by SNAP law) must be at or below 130% of the federal poverty level, and household net (SNAP-specified deductions are subtracted) monthly income must be at 100% of the federal poverty level. The traditional asset rules are set at \$2,000 per household (inflation adjusted). (Households that contain an elderly or disabled member have a higher asset limit and also do not have to meet the gross income test.) Under *categorical* eligibility, SNAP eligibility is automatically conveyed based upon the applicant's participation in other means-tested programs, namely Supplemental Security Income (SSI), Temporary Assistance for Needy Families (TANF), or General Assistance (GA). Because TANF is a broad-purpose block grant, the state option to extend SNAP eligibility to applicants that receive a TANF-funded benefit allows states to offer program eligibility under rules that vary from those discussed in this paragraph, including an elimination of the asset test.

If eligible for SNAP, an applicant household also undergoes a calculation of its monthly benefit amount (or allotment). This calculation utilizes the household's net income as well as the maximum allotment, a figure that equals the current value of the "Thrifty Food Plan" (TFP). The American Recovery and Reinvestment Act temporarily increased this value.

Benefits are issued on an EBT card, which operates with a declining balance like a debit card. Benefits are not cash, may not be accessed at an automatic teller machine, and are redeemable only for foods. Benefits may be redeemed for foods at licensed retailers, which may include a wide variety of retailers so long as retailers meet licensing requirements.

This report focuses on SNAP eligibility and the form and function of benefits. For an overview of SNAP along with the other USDA-FNS programs, such as the Emergency Food Assistance Program (TEFAP), Commodity Supplemental Food Program (CSFP), and National School Lunch Program (NSLP), please see CRS Report R42353, *Domestic Food Assistance: Summary of Programs*. For recent SNAP appropriations and spending, please see CRS Report R41964, *Agriculture and Related Agencies: FY2012 Appropriations*. For issues related to SNAP and the farm bill, please see CRS Report R42442, *Expiration and Possible Extension of the 2008 Farm Bill*, by Jim Monke, Megan Stubbs, and Randy Alison Aussenberg; and CRS Report R42829, *Domestic Food Assistance in 2012 Farm Bill Proposals: S. 3240 and H.R. 6083*.

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Introduction

The Supplemental Nutrition Assistance Program (SNAP), formerly called the Food Stamp Program, is designed primarily to increase the food purchasing power of eligible low income households to a point where they can buy a nutritionally adequate low cost diet. This report describes the rules related to eligibility for SNAP benefits and the rules related to the issuance and use of benefits.

SNAP is authorized by the Food and Nutrition Act of 2008. This law, formerly the Food Stamp Act of 1977, has since 1973 been reauthorized by the “farm bill,” omnibus legislation that also typically includes the reauthorization of other federal agricultural policies and programs. The 2008 farm bill expired at the end of FY2012 and then was extended through the end of FY2013 in the American Taxpayer Relief Act of 2012 (H.R. 8, enacted on January 2, 2013). During the period of expiration, many of the farm bill nutrition programs continued to operate due to appropriations actions.¹ For information on SNAP reauthorization in the 112th Congress, please see CRS Report R42829, *Domestic Food Assistance in 2012 Farm Bill Proposals: S. 3240 and H.R. 6083*.

The Food, Conservation, and Energy Act of 2008 (“2008 farm bill,” P.L. 110-246) changed the name of the program from the Food Stamp Program to SNAP and revised the name of the governing law from the Food Stamp Act to the Food and Nutrition Act. State names for the program may vary; some states continue to name their programs “food stamps,” while others have switched to SNAP or maintain another name.

The U.S. Department of Agriculture’s Food and Nutrition Service (USDA-FNS) administers SNAP.³ Although a detailed framework of federal law and regulation exists, a robust framework of state options and waivers exists as well. In this way, while universal concepts of benefit eligibility and administration exist among the states, there also are many policies that vary among the states. This report will focus on the federal framework but will at times discuss state options that may cause state and local programs to vary.

SNAP in Fiscal Year 2011
In FY2012, an average of 46.6 million individuals in 22.3 million households participated in SNAP each month.²

SNAP benefits are available for households that meet federal financial eligibility tests for limited monthly income and liquid assets. However, these rules can be bypassed through the use of “categorical eligibility” for SNAP. Categorical eligibility provides states with the ability to modify federal financial eligibility rules. As of October 2012, 43 states utilize broad-based categorical eligibility, although several do so with an added limit on liquid assets.⁴ To be eligible

¹ Please see CRS Report R42442, *Expiration and Possible Extension of the 2008 Farm Bill*, by Jim Monke, Megan Stubbs, and Randy Alison Aussenberg for a further discussion of issues of farm bill expiration, extension, and appropriations.

² Unless otherwise noted, administrative data in this report are from USDA-FNS. Please note: this report includes figures from FY2010, FY2011, and FY2012; the year chosen represents the most current data available for the respective measure.

³ For a history of the SNAP program beginning in 1939, please see USDA-FNS’s “About SNAP” website: <http://www.fns.usda.gov/snap/rules/Legislation/about.htm>.

⁴ For more information, please see CRS Report R42054, *The Supplemental Nutrition Assistance Program: Categorical Eligibility*, by Gene Falk and Randy Alison Aussenberg.

for SNAP, a household must fulfill requirements related to work effort and must meet citizenship and legal permanent residence tests.

In general, the maximum SNAP benefit is based upon the level of the U.S. Department of Agriculture's lowest cost food plan (the Thrifty Food Plan or TFP) and varies by household size. Before April 2009, the maximum SNAP benefit was simply set at the level of the TFP; however, the American Recovery and Reinvestment Act of 2009 (P.L. 111-5) increased the maximum benefit by an additional 13.6% above the 2008 TFP. This higher maximum benefit will continue until October 31, 2013.⁵

Monthly SNAP benefit amounts are calculated as the difference between the household's expected contribution to its food costs and the maximum benefit. (Participating households are expected to devote 30% of their "net" monthly cash income to food purchases.) Thus, a recipient household with no "net" cash income receives the maximum monthly SNAP allotment for its size while a household with some counted income receives a lesser allotment, the maximum benefit minus 30% of the net income. Net income is the gross income with certain specified deductions subtracted.

Eligibility

SNAP has financial, work-related, and "categorical" tests for eligibility. Its financial tests require that those eligible have monthly income and liquid assets below limits set by law and adjusted for inflation. Under the work-related tests, certain household members must register for work, accept suitable job offers, and fulfill work or training requirements (such as looking or training for a job) established by their state public assistance agency. Under a work requirement established in 1996, SNAP eligibility for Able-bodied Adults Without Dependents (ABAWDs) is limited to 3 months in any 36-month period unless the ABAWD works at least half time or is in a work or training program. Categorical eligibility rules make some automatically eligible for SNAP assistance (most who receive a benefit from the Temporary Assistance for Needy Families [TANF] block grant or receive Supplemental Security Income [SSI] or state [GA] cash benefits). In addition to categorical eligibility rules, there are also categorical denials of eligibility to specific groups (e.g., strikers, many noncitizens and postsecondary students, people living in institutional settings, many drug felons). However, applications cannot be denied because of the length of a household's residence in a SNAP agency's jurisdiction, because the household has no fixed mailing address or does not reside in a permanent dwelling, or because the applicant does not provide a driver's license or photograph identification.

The SNAP Household

The basic SNAP beneficiary unit is the household. A household can be either a person living alone or a group of individuals living together; there is no requirement for cooking facilities. The SNAP household definition is different than that used in other means-tested programs (e.g., TANF families with dependent children, elderly or disabled individuals or couples in the SSI Program). However, it is close to those used by some other programs such as the National School

⁵ For more information, please see CRS Report R41374, *Reducing SNAP (Food Stamp) Benefits Provided by the ARRA: P.L. 111-226 and P.L. 111-296*, by Randy Alison Aussenberg, Jim Monke, and Gene Falk.

Lunch Program; the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC); and the Low-Income Home Energy Assistance Program (LIHEAP).

Generally speaking, individuals living together constitute a single household if they customarily purchase food and prepare meals together. Members of the same household must apply together, and their income, expenses, and assets normally are aggregated in determining food stamp eligibility and benefits. However, persons who live together can sometimes be considered separate “households” for program purposes: related co-residents generally are required to apply together, and special rules apply to those living in institutional settings.

Persons who live together, but purchase food and prepare meals separately, may apply for SNAP benefits separately, except for (1) spouses; (2) parents and their children (21 years or younger); and (3) minors 18 years or younger who live under the parental control of a caretaker (excluding foster children and, in some cases, certain citizen children, who may be treated separately). In addition, persons 60 years or older who live with others and cannot purchase food and prepare meals separately because of a substantial disability may apply separately from their co-residents as long as their co-residents’ income is below prescribed limits (165% of the federal poverty guidelines).

Although those living in institutional settings generally are barred from the SNAP, individuals in certain types of group living arrangements may be eligible and are automatically treated as separate households, regardless of how food is purchased and meals are prepared. These arrangements must be approved by state or local agencies and include residential drug addict or alcoholic treatment programs, small group homes for the disabled, shelters for battered women and children, and shelters for the homeless.

If a household includes an elderly or disabled member, the household is entitled to different SNAP deduction rules as well as some different financial eligibility rules (discussed in the next section). For one- and two-person households that are financially eligible, they are also assured a minimum monthly benefit of \$16 (FY2013). Without the minimum benefit it may be possible that these smaller households would be eligible for SNAP but for an arguably negligible amount. It is possible that different SNAP households can live together, and recipients can reside with non-recipients. In the case of recipients residing with non-recipients, the eligibility and benefit level of the household is based on a household size that excludes the non-recipient. Whether the non-recipient’s income or assets are included depends upon the specific circumstances.

Financial Eligibility

There are two pathways to eligibility for SNAP. The first is the “traditional pathway” to eligibility with financial eligibility thresholds stated in the Food and Nutrition Act (7 U.S.C. 2011 et seq.). Federal law sets income and asset eligibility thresholds as well as the rules for what types of income and assets are counted or disregarded. Also, the act lists what types of expenses can be deducted in determining income eligibility and, if eligible, determining the benefit amount.

The second pathway is known as “categorical eligibility.” The basis of categorical eligibility is a rule that makes households composed entirely of recipients of benefits funded from the Temporary Assistance for Needy Families (TANF) block grant, Supplemental Security Income cash assistance, or state General Assistance (GA) automatically eligible for SNAP. Recipients of benefits from these programs bypass financial eligibility rules and automatically go to the next step, determining SNAP benefits. However, states have the option of interpreting categorical

eligibility broadly. Below is a discussion of the traditional pathway to SNAP eligibility, followed by a discussion of categorical eligibility.

The Traditional Path to Eligibility

For households without an elderly or disabled member, SNAP uses both the household's basic (or "gross") monthly income and its counted (or "net") monthly income. Eligible households' gross income must be at or below gross income standards and their counted income must meet net income eligibility thresholds. When judging eligibility for households with elderly or disabled members, only the household's counted net monthly income is considered; in effect, this procedure applies a somewhat more liberal income test to the elderly and disabled.

Income and SNAP Deductions

Gross monthly income includes all of a household's cash income except the following "exclusions" (disregards):⁶ (1) most payments made to third parties (rather than directly to the household); (2) unanticipated, irregular, or infrequent income, up to \$30 a quarter; (3) loans (student loans are treated as student aid, see (10)); (4) income received for the care of someone outside the household; (5) nonrecurring lump sum payments such as income tax refunds, retroactive lump sum Social Security payments, and certain charitable donations (in many cases, these may instead be counted as liquid assets); (6) federal energy assistance (e.g., LIHEAP); (7) reimbursement for expenses;⁷ (8) income earned by schoolchildren 17 or younger; (9) the cost of producing self-employment income; (10) federal post-secondary student aid (e.g., Pell grants, student loans); (11) advance payments of federal earned income credits; (12) "on the job" training earnings of dependent children under 19 in the Workforce Investment Act (WIA) programs, as well as monthly "allowances" under these programs; (13) income set aside by disabled SSI recipients under an approved "plan for achieving self support"; (14) combat-related military pay; and (15) payments required to be disregarded by provisions of federal law outside the Food and Nutrition Act (e.g., various payments under laws relating to Indians, payments under Older Americans Act employment programs for the elderly). In addition, states may, within certain limits, choose to exclude other types of income that they disregard in their TANF or Medicaid programs.

Net monthly income is computed by subtracting certain "deductions" from a household's basic (or gross) monthly income. This calculation is based on the recognition that not all of a household's income is available for food purchases. Thus, a standard portion of income, plus amounts representing costs such as work expenses or high non-food living expenses, is deducted from the gross income.

For households *without an elderly or disabled member*, net monthly income equals gross monthly income minus the following deductions, if applicable:

- **Standard deduction:** A "standard" monthly deduction that varies by household size and is indexed for inflation (see below for details). Every applicant household gets this deduction.

⁶ These income exclusions are found in Section 5(d) of the Food and Nutrition Act, codified at 7 U.S.C. 2014(d).

⁷ So long as those reimbursements do not constitute a "gain or benefit" to the household.

- **Earned income deduction:** 20% of any earned income, in recognition of taxes and work expenses;
- **Child support deduction:** Any amounts paid out as legally obligated child support;
- **Dependent care deduction:** Out-of-pocket dependent care expenses, when related to work or training;⁸ and
- **Excess shelter deduction:** Shelter expenses (including utility costs, which states may standardize with a “standard utility allowance” calculation) that exceed 50% of net income after all other deductions, typically expenses that exceed about one-third of gross monthly income (see below for limits).

The amount of the *standard deduction* depends upon household size and statutorily set parameters (amounts shown in **Table 1** for FY2013). Per statute, the standard deduction is either 8.31% of the annually indexed federal poverty income guidelines for each household size (these are based on the poverty guidelines which are indexed for inflation) or specific minimum numbers in statute that are also indexed for inflation.⁹ In the 48 states and the District of Columbia, the FY2013 minimum standard deduction is \$149 a month. Recognizing different living costs, different standard deductions apply in Alaska, Hawaii, Guam, and the Virgin Islands.

Table 1. SNAP Standard Deductions for FY2013 (per month)

Geographic Area	Household Size				
	1-2	3	4	5	6+
48 states and District of Columbia	\$149	\$ 149	\$ 160	\$ 187	\$ 214
Alaska	\$256	\$ 256	\$ 256	\$ 256	\$ 268
Hawaii	\$211	\$ 211	\$ 211	\$ 215	\$ 247
Guam	\$300	\$ 300	\$ 319	\$ 374	\$ 429
Virgin Islands	\$132	\$ 132	\$ 160	\$ 187	\$ 214

Source: U.S. Department of Agriculture, Food and Nutrition Service. http://www.fns.usda.gov/snap/government/FY13_Allot_Deduct.htm.

The *excess shelter deduction* is restricted to annually indexed monthly limits. For FY2013, these are \$469 for the 48 states and the District of Columbia, \$749 for Alaska, \$632 for Hawaii, \$550 for Guam, and \$369 for the Virgin Islands. (This deduction is a way to further account for the variability of shelter costs across the country.)

For *households with an elderly or disabled member*, counted monthly income equals gross monthly income minus:

- The same **standard, child support, earned income, and dependent care** deductions noted above;

⁸ Limits on SNAP deductions for dependent care were lifted under the 2008 farm bill (P.L. 110-246).

⁹ Inflation adjustment of the minimum was added by the 2008 farm bill (P.L. 110-246).

- An uncapped excess shelter deduction, to the extent such expenses exceed 50% of counted income after all other deductions, with no limit; and
- Any out-of-pocket medical expenses (other than those for special diets) that are incurred by an elderly or disabled household member, to the extent they exceed a threshold of \$35 a month.

Under the traditional path to SNAP eligibility, households must have net monthly income that does not exceed the inflation-adjusted federal poverty guidelines (100% FPL). Households without an elderly or disabled member also must have gross/basic monthly income that does not exceed 130% of the inflation-adjusted federal poverty guidelines (130% FPL). Both these income eligibility limits are uniform for the 48 contiguous states, the District of Columbia, Guam, and the Virgin Islands; somewhat higher income eligibility limits (because of higher poverty guidelines) are applied in Alaska and Hawaii. Net and gross income eligibility limits (which are adjusted for inflation each October) are summarized in **Table 2**.

The calculation of net income discussed in this section is pertinent not just for determining eligibility but also for calculating the SNAP benefit amount to which the household is entitled (discussed below in “Benefit Amounts (Allotments)”).

Table 2. Counted (Net) and Basic (Gross) Monthly Income Eligibility Limits for SNAP, FY2013

Eligibility Limits in Effect October 1, 2012, to September 30, 2013

Household size	48 States, DC, and the Territories	Alaska	Hawaii
Counted (net) monthly income eligibility limits (100% of poverty):			
1 person	\$931	\$1,165	\$1,072
2 persons	1,261	1,577	1,451
3 persons	1,591	1,990	1,830
4 persons	1,921	2,402	2,210
5 persons	2,251	2,815	2,589
6 persons	2,581	3,227	2,968
7 persons	2,911	3,640	3,347
8 persons	3,241	4,052	3,726
Each additional person	330	413	380
Basic (gross) monthly income eligibility limits (130% of poverty):			
1 person	\$1,211	\$1,514	\$1,394
2 persons	1,640	1,577	1,887
3 persons	2,069	2,586	2,379
4 persons	2,498	3,123	2,872
5 persons	2,927	3,659	3,365
6 persons	3,356	4,195	3,858

Household size	48 States, DC, and the Territories	Alaska	Hawaii
7 persons	3,785	4,731	4,351
8 persons	4,214	5,268	4,844
Each additional person	429	537	493

Source: U.S. Department of Agriculture, Food and Nutrition Service.

Assets

Under the traditional pathway to eligibility, households must have counted liquid assets that do not exceed federally prescribed limits. In FY2013, households *without* an elderly or disabled member cannot have counted liquid assets above \$2,000. In that year, households *with* an elderly or disabled member cannot have counted liquid assets above \$3,250. Under the terms of the Food, Conservation, and Energy Act of 2008 (“2008 farm bill”; P.L. 110-246), these dollar limits are to be annually indexed for overall inflation (and rounded down to the nearest \$250).

Counted liquid assets include cash on hand, checking and savings accounts, savings certificates, stocks and bonds, and nonrecurring lump sum payments such as insurance settlements and lump-sum payments that have been disregarded as income (e.g., some tax refunds) but have not been spent. Certain assets also are counted: a portion of the value of vehicles (in some cases) and the equity value of property not producing income consistent with its value (e.g., recreational property).

Counted assets do not include the value of the household’s primary residence (home and surrounding property); business assets; personal property (household goods and personal effects); lump sum earned income tax credit and other non-recurring payments; burial plots; the cash value of life insurance policies; the value of all tax-recognized pension savings/plans and education savings (effective in October 2009); and certain other resources whose value is not accessible to the household, would not yield more than \$1,000 if sold (e.g., a car with a small equity value), or are required to be disregarded by other federal laws.

Some special rules apply when counting allowable assets. Although the general rule is that the fair market value of a vehicle in excess of \$4,650 is to be counted as an asset, states may (and most often do) count vehicles as assets only to the extent they do under their TANF programs or disregard them entirely. Moreover, states generally may exclude additional assets to the extent they do so under their TANF or Medicaid programs.

Categorical Eligibility

SNAP also conveys eligibility to households that already participate in specific means-tested programs. This concept of “categorical eligibility” is discussed at greater length, including state-by-state decisions, in CRS Report R42054, *The Supplemental Nutrition Assistance Program: Categorical Eligibility*, by Gene Falk and Randy Alison Aussenberg.

Households composed entirely of recipients of benefits funded from the Temporary Assistance for Needy Families (TANF) block grant, Supplemental Security Income cash assistance, or state General Assistance (GA) are automatically, or categorically, based on the participation in these other programs, eligible for SNAP. States have the option to use categorical eligibility widely

among applicants, permitting them to bypass the income eligibility and, most importantly, the asset eligibility rules of the traditional pathway to SNAP eligibility discussed above.

The breadth of this categorical option results particularly from the option to grant SNAP eligibility to those who receive a *TANF-funded* benefit. As TANF is a flexible block grant with a wide range of allowable expenditures, this means that any TANF benefit or services, not just traditional cash welfare, can result in categorical eligibility for SNAP. As of October 2012, 43 states were conveying broad-based categorical eligibility by extending a nominal TANF-funded benefit, such as a brochure or application; 5 of these states had imposed an asset limit in addition to allowing this eligibility.¹⁰

Under SNAP regulations, states do have to assign a gross income limit of 200% of the federal poverty line or less in order to use a TANF-funded benefit to make applicants eligible. However, categorical eligibility does not automatically mean that a household is entitled to a SNAP benefit. Households must still have net income below a level that results in a non-zero SNAP benefit.

Work-Related Eligibility Requirements

To gain or retain eligibility, most able-bodied adults must (1) register for work (typically with the SNAP state agency or a state employment service office); (2) accept a suitable job if offered one; (3) fulfill any work, job search, or training requirements established by administering SNAP agencies; (4) provide the administering public assistance agency with sufficient information to allow a determination with respect to their job availability; and (5) not voluntarily quit a job without good cause or reduce work effort below 30 hours a week. Individuals are disqualified from SNAP for failure to comply with work requirements for periods of time that differ based upon whether the violation is the first, second, or third. Minimum periods of disqualification, which may be increased by the state SNAP agency, range from one to six months. In addition, states have the option to disqualify the entire household if the household head fails to comply with work requirements for up to 180 days.

Those who are exempt by law from the work requirements listed above include individuals physically or mentally unfit for work; under age 16 or over age 59; between ages 16 and 18 if they are not a head of household or are attending school or a training program; persons working at least 30 hours a week or earning the minimum wage equivalent; persons caring for dependents who are disabled or under age 6; those caring for children between ages 6 and 12 if adequate child care is not available (this second exemption is limited to allowing these persons to refuse a job offer if care is not available); individuals already subject to and complying with another assistance program's work, training, or job search requirements (for example, Temporary Assistance for Needy Families [TANF] or unemployment compensation); eligible postsecondary students; and residents of substance abuse treatment programs. In FY2011, nearly 54% of SNAP participants were not expected to work because of age (45% of participants were children, nearly 9% were elderly).¹¹ Approximately 20% of SNAP households in FY2011 included at least one disabled, nonelderly participant.

¹⁰ Please see Table 1 of CRS Report R42054, *The Supplemental Nutrition Assistance Program: Categorical Eligibility*, by Gene Falk and Randy Alison Aussenberg.

¹¹ U.S. Department of Agriculture, Food and Nutrition Service, Office of Research and Analysis, *Characteristics of Supplemental Nutrition Assistance Program Households: Fiscal Year 2011*, by Mark Strayer, Esa Eslami, and Joshua Leftin, p. 23.

Employment and Training (E&T) Activities

Those not exempted by one of the above listed rules must, at least, register for work and accept suitable job offers. However, their state SNAP agency may require them to fulfill some type of work, job search, or training obligation. SNAP agencies must operate an Employment and Training (E&T) program of their own design for work registrants whom they designate. SNAP agencies may require all work registrants to participate in one or more components of their program, or limit participation by further exempting additional categories and individuals for whom participation is judged impracticable or not cost effective. States may also make E&T activities open only to participants who volunteer to participate. Program components can include any or all of the following activities: supervised job search or training for job search, workfare (work-for-benefits), work experience or training programs, education programs to improve basic skills, or any other employment or training activity approved by USDA-FNS.¹²

Recipients who participate in an E&T activity beyond work registration cannot be required to work more than the minimum wage equivalent of their household's benefit. Total hours of participation (including both work and any other required activity) cannot exceed 120 hours a month. SNAP agencies also must reimburse participants' costs directly related to participation (e.g., transportation and child care). The federal government shares in half the cost of this support, and state agencies may limit support to local market rates for necessary dependent care.¹³

For FY2011, states reported that there were approximately 6.6 million new work registrants; approximately 2.8 million participated in an employment and training effort.¹⁴

“ABAWD” Rule

In addition to SNAP's work registration and Employment and Training program requirements, there is a special work requirement for able-bodied adults, aged 18 to 49 who are without dependents (ABAWDs). This requirement for ABAWDs—often referred to as the “ABAWD Rule”—was added by the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA, P.L. 104-193).

SNAP law limits ABAWDs to benefits for three months out of a 36-month period, unless the participant

- works at least 20 hours per week;
- participates in an employment and training program for at least 20 hours per week; or
- participates in a SNAP “workfare” program for at least 20 hours per week.

¹² Further resources on the SNAP Employment and Training program: USDA-FNS SNAP website and related resources: <http://www.fns.usda.gov/snap/rules/Memo/Support/employment-training.htm>. See also Section 6(d) of the Food and Nutrition Act.

¹³ E&T program financing is discussed in USDA-FNS's Annual Budget Justification. See, for example, <http://www.obpa.usda.gov/30fns2013notes.pdf>, p. 30-105.

¹⁴ U.S. Department of Agriculture, Food and Nutrition Service, Office of Research and Analysis, *Characteristics of Supplemental Nutrition Assistance Program Households: Fiscal Year 2011*, by Mark Strayer, Esa Eslami, and Joshua Leftin, Table A.25.

States have the option, but are not required, to offer ABAWDs a slot in an employment and training program or a workfare program. Some states “pledge” to serve all ABAWDs in such programs, others do not. States that “pledge” to serve all ABAWDs in these programs receive extra federal funding for that purpose. If a state does not offer an ABAWD a slot in an employment and training or workfare program, benefits can be terminated for those without at least a half-time job once the three-month limit is reached, unless the individual is covered by an exemption or a “waiver” of the ABAWD requirement.

Those disqualified under this rule are able to reenter the program if, during a 30-day period, they work 80 hours or more or participate in a work/training activity. ABAWDs who become employed, but then again lose their jobs can, under some circumstances, earn an additional 3 months of eligibility, bringing their maximum months of SNAP receipt without working at least 20 hours per week or being in an approved work or training program to 6 months in a 36-month period.

Waivers of the ABAWD rule, at a state’s request, were also included in PRWORA. The statute provides that the ABAWD rule can be waived (1) for areas with an unemployment rate of over 10% or (2) if an area “does not have a sufficient number of jobs to provide employment for the individuals.”¹⁵ Moreover, states may, on their own initiative, exempt up to 15% of those covered under this work rule.¹⁶

The American Recovery and Reinvestment Act (ARRA) suspended the ABAWD rule from April 2009 through September 2010, and the Administration’s Budget Requests for FY2011, 2012, and 2013 included a proposals to suspend the ABAWD rule for each respective year.¹⁷

Individuals *Ineligible* for SNAP

Eligibility is sometimes denied for reasons other than financial need or compliance with work-related requirements.

Many *non-citizens* are barred—eligibility is extended only to permanent residents legally present in the United States for at least five years, legal immigrant children (under 18), the elderly and disabled who were legally resident before August 1996, refugees and asylees, veterans and others with a military connection, those with a substantial history of work covered under the Social Security system, and certain other limited groups of aliens.¹⁸

¹⁵ Authority for these waivers is located in Section 6(o)(4) of the Food and Nutrition Act of 2008, codified at 7 U.S.C. 2015(o)(4).

¹⁶ Also, the Balanced Budget Act of 1997 (P.L. 105-33) added 15% ABAWD exemptions for states (Section 6(o)(6) of the Food and Nutrition Act, codified at 7 U.S.C. 2015(o)(4)). The 15% exemptions are beyond the scope of this memorandum, but further details on the exemptions can be found on the USDA-FNS website: <http://www.fns.usda.gov/snap/rules/Memo/PRWORA/abawds/ABAWDsPage.htm>.

¹⁷ See USDA-FNS’s FY2013 Budget Justification, <http://www.obpa.usda.gov/30fns2013notes.pdf>, p. 30-85 and analogous documents for FY2011 and FY2012.

¹⁸ Non-citizen rules are many, intersecting, and tied to a number of state options. USDA-FNS has published a comprehensive guide to non-citizen rules in SNAP - USDA-FNS, Supplemental Nutrition Assistance Program: Guidance on Non-citizen Eligibility, April 2011, http://www.fns.usda.gov/snap/government/pdf/Non-Citizen_Guidance_063011.pdf. Also see CRS Report RL33809, *Noncitizen Eligibility for Federal Public Assistance: Policy Overview and Trends*, by Ruth Ellen Wasem.

SNAP benefits are denied those who intentionally violate program rules, for specific time periods ranging from one year (on a first violation) to permanently (on a third violation or other serious infraction); and states may impose SNAP disqualification when an individual is disqualified from another public assistance program. Those who transfer assets for the purpose of qualifying for benefits are also barred.

For the most part, *college students* (attending higher education courses half-time or more) between ages 18 and 50 are ineligible for SNAP. A student enrolled in an institution of higher education more than half-time is only eligible for SNAP benefits if the individual is (1) under 18 years old or age 50 or older; (2) disabled; (3) enrolled in school because of participation in certain programs;¹⁹ (4) employed at least 20 hours per week or participates in a work-study program during the school year; (5) a parent (in some circumstances),²⁰ OR (6) receiving TANF cash assistance benefits.

Other *ineligibility* rules include the following:

- Households with members on strike are denied benefits unless eligible prior to the strike.
- Individuals living in institutional settings are denied eligibility, except those in special SSI-approved small group homes for the disabled, persons living in drug addiction or alcohol treatment programs, and persons in shelters for battered women and children or shelters for the homeless.
- Boarders cannot receive SNAP benefits unless they apply together with the household in which they are boarding.
- Persons who fail to provide Social Security numbers or cooperate in providing information needed to verify eligibility or benefit determinations are ineligible.
- Automatic disqualification is required for those applying in multiple jurisdictions, fleeing arrest, or convicted of a drug-related felony.²¹
- States may disqualify individuals not cooperating with child support enforcement authorities or in arrears on their child support obligations.

SNAP Benefits Under Special Eligibility Rules

There are circumstances where SNAP benefits are offered separately and distinctly from the standard SNAP application and eligibility process. These situations include the issuance of “transitional” and “disaster” benefits.

¹⁹ A program under title I of the Workforce Investment Act, a SNAP Employment and Training program, a program under section 236 of the Trade Act of 1974, a work incentive program under title IV of the Social Security Act, or “another program for the purpose of employment and training operated by a state or local government, as determined to be appropriate by the Secretary.”

²⁰ An otherwise ineligible student is eligible for SNAP if the student is (1) a single parent enrolled in school full-time caring for a dependent under the age of 12 years old, (2) a parent caring for a dependent under age 6, or (3) a parent caring for a child between the ages of 5 and 12 years old for whom child care is not available to enable the parent to both attend class and work 20 or more hours per week.

²¹ This matter is further discussed along with other programs’ related rules, in CRS Report R42394, *Drug Testing and Crime-Related Restrictions in TANF, SNAP, and Housing Assistance*, by Maggie McCarty et al.

Transitional Benefits

States are allowed to provide “transitional” benefits. States have the option to offer up to five months’ transitional SNAP benefits to those leaving TANF or a similar state-financed program (for reasons other than a sanction)—without requiring that the household apply for SNAP. The transitional benefit is the amount received prior to leaving TANF (or a similar state program), adjusted to account for the loss of TANF/state cash income. Transitional benefit households may reapply during the five-month period to have their benefits adjusted based on changed circumstances, and states may opt to adjust benefits based on information received from another program (like Medicaid) in which the household participates. At the end of the transitional period, households may reapply for continued benefits under regular SNAP rules. According to the FY2010 SNAP State Options Report, 21 states provide transitional benefits.²²

Disaster Benefits (“D-SNAP”)

For areas affected by a natural or other disaster, states may request that USDA operate the Disaster Supplemental Nutrition Assistance Program (D-SNAP).²³ SNAP benefits are provided to already participating SNAP households who qualify for replacement or additional benefits as well as to non-SNAP households who become temporarily eligible under D-SNAP rules. If the disaster results in households’ ongoing loss of income, households may be eligible to apply for SNAP under regular program rules after the D-SNAP benefit period has ended.

Benefits

SNAP benefits are 100% federally financed and constitute the vast majority of federal spending for the SNAP program. This section discusses how SNAP benefit amounts are determined, how the benefits are issued, what benefits may and may not be used for, and the redemption of benefits.

SNAP Federal Spending on Benefits

In FY2012, of the \$78.2 billion in federal spending for the SNAP program, 95% (\$74.6 billion) was spent on benefits themselves.

Benefit Amounts (Allotments)

The eligibility rules of SNAP, discussed above, create a framework by which individuals (constituting a household) are eligible or ineligible for benefits, but once eligible, the participant is also subject to a benefit calculation process, which determines the household’s monthly benefit amount or allotment. The calculation of SNAP benefits takes into account the size of the household, the maximum benefit for the fiscal year, and the household’s net income. For one- and two-person households, the minimum benefit may also play a role.

²² USDA-FNS, *Supplemental Nutrition Assistance Program: State Options Report*, November 2010, p. 4, http://www.fns.usda.gov/snap/rules/Memo/Support/State_Options/9-State_Options.pdf.

²³ Please see the USDA-FNS website for further details on D-SNAP and the provision of benefits during emergencies in recent years: <http://www.fns.usda.gov/disasters/disaster.htm>.

Maximum Monthly Allotments

Maximum monthly benefit allotments are tied to the cost of purchasing a nutritionally adequate low cost diet, as measured by the USDA-created and -calculated Thrifty Food Plan (TFP). The TFP is the cheapest of four diet plans meeting minimal nutrition requirements devised by USDA,

What share of SNAP households received the maximum allotment?
 In FY2011, almost 41% of SNAP households received the maximum possible benefit. This means 41% of households had a SNAP “net income” of \$0.

specifically USDA’s Center for Nutrition Policy and Promotion (CNPP). Maximum allotments are set at the monthly cost of the TFP for a four-person family consisting of a couple between ages 20 and 50 and two school-age children, adjusted for family size (using a formula reflecting economies of scale developed by the Human Nutrition Information Service), and rounded down to the nearest whole dollar. Allotments are adjusted for food price inflation annually, each October, to reflect the cost of the TFP in the immediately previous June. Although USDA calculates the

cost of the TFP each year to account for food price inflation, the *contents* of the TFP—often thought of as its own market basket of goods—were last revised in 2006.²⁴ Maximum allotments are standard across the 48 contiguous states and the District of Columbia, but they are higher, reflecting substantially different food costs, in Alaska, Hawaii, Guam, and the Virgin Islands.

Table 3. Maximum Possible Monthly SNAP Allotments, FY2013

Effective October 1, 2012, through September 30, 2013

Household size	48 States and D.C.	Alaska ^a	Hawaii	Guam	Virgin Islands
1 person	\$200	\$239	\$314	\$295	\$257
2 people	367	438	575	541	472
3 people	526	627	824	775	676
4 people	668	797	1,046	985	859
5 people	793	946	1,243	1,169	1,020
6 people	952	1,135	1,491	1,403	1,224
7 people	1,052	1,255	1,648	1,551	1,353
8 people	1,202	1,434	1,884	1,773	1,546
Each additional person	150	179	236	222	193

Source: USDA, Food and Nutrition Service

Notes: These FY2013 maximums represent 113.6% of the June 2008 Thrifty Food Plan as authorized by the American Recovery and Reinvestment Act (P.L. 111-5).

- a. Maximum allotment levels in rural Alaska are 27% to 55% higher than the urban Alaska allotments noted in this table. Rural Alaska’s maximum allotments can be found at http://www.fns.usda.gov/snap/government/FY13_Allot_Deduct_AKHIGUVI.htm.

²⁴ Additional USDA resources on the Thrifty Food Plan: Andrea Carlson, Mark Lino, and WenYen Juan, et al., *Thrifty Food Plan, 2006*, USDA Center for Nutrition Policy and Promotion, April 2007, <http://www.cnpp.usda.gov/Publications/FoodPlans/MiscPubs/TFP2006Report.pdf>; USDA-CNPP website, <http://www.cnpp.usda.gov/usdafoodplanscostoffood.htm>.

Calculation of a Household’s Monthly Benefit

SNAP benefits are a function of a household’s size, its net (counted) monthly income, and inflation-indexed maximum monthly benefit levels (in some cases, adjusted for geographic location). An eligible household’s net income is determined (i.e., the deductions noted earlier for judging eligibility are subtracted from gross income), its maximum benefit level is established, and a benefit is calculated by subtracting its expected contribution (by law, 30% of its net income) from its maximum allotment. This equation is illustrated in **Figure 1**. Thus, a three-person household in one of the 48 states with \$400 in counted net income (after deductions) would receive a monthly allotment of \$406 in FY2013 (i.e., the 2012 maximum three-person benefit in the 48 states, \$526, less 30% of the household’s net income, \$120). A three-person household with no counted income would receive the maximum allotment.

Figure 1. Calculating the Monthly Benefit for a Hypothetical Household in FY2013

This Illustration Utilizes a Three-Person Household in the 48 States with Net Income of \$400

	Maximum Monthly Benefit (\$526)
-	30% of Net Monthly Income (.30 x \$400 = \$120)
	SNAP Monthly Benefit (\$406)

Source: Figure generated by CRS, based on benefit calculation rules.

Allotments are not taxable and purchases made with SNAP benefits may not be charged sales taxes. Receipt of SNAP benefits does not affect eligibility for or benefits provided by other public assistance programs, although some programs use SNAP participation as a “trigger” for eligibility, and others take into account the general availability of SNAP benefits in deciding what level of benefits to provide.

Minimum Benefit

Under provisions of the Food, Conservation, and Energy Act of 2008 (“2008 farm bill”; P.L. 110-246), eligible households are guaranteed a minimum monthly benefit allotment equal to 8% of the maximum benefit for a one-person household; effective October 2008, this replaces an older rule stipulating a minimum benefit of \$10 a month only for one- and two-person households. For FY2013, the minimum benefit is \$16 a month. This means that if benefit calculation for a one- or two-person household yields a result of *less than* \$16, that household is guaranteed to receive \$16 a month.

<p>Average Allotments</p> <p>In FY2012, monthly benefits averaged \$133 per person, \$278 per household.</p>

Issuance of Benefits

Benefit issuance is a state agency responsibility, and states contract with private vendors to carry out most of their issuance activities. Benefits are provided through electronic benefit transfer (EBT) systems under which recipients are issued a debit-like card that they use to make food purchases. At the point of sale, retailers automatically debit the recipient's SNAP account and credit their own account. EBT cards can include both SNAP benefits (usable only to buy food items) and cash benefits (e.g., TANF payments, unemployment payments, child support payments); only cash benefits can be accessed using the card at ATMs.²⁵

SNAP benefits normally are issued monthly. The state SNAP agency must either deny eligibility or make benefits available within 30 days of initial application and must provide allotments without interruption if an eligible household reapplies and fulfills recertification requirements in a timely manner. Households in immediate need because of little or no income and very limited cash assets, as well as the homeless and those with extraordinarily high shelter expenses, must be given expedited service (provision of benefits within seven days of initial application). A household's calculated monthly allotment can be prorated (reduced) for one month. On application, a household's first month's benefit is reduced to reflect the date of application. If a previously participating household does not meet eligibility recertification requirements in a timely fashion, but does become certified for eligibility subsequently, benefits for the first month of its new certification period normally are prorated to reflect the date when recertification requirements were met.

Redemption of Benefits

SNAP benefits are not the same as cash. As such, they are only redeemable at authorized stores, equipped with EBT machines. Also, EBT issuance of benefits is technologically designed so that they may only be redeemed for SNAP-eligible foods and the benefit cards may not be used at automatic teller machines. "Trafficking" is the term used to refer to the sale of SNAP benefits for cash. Trafficking is illegal and enforced by USDA-FNS using a number of methods. The Food and Nutrition Act includes penalties for retailers and participants engaged in trafficking; penalties include fines and imprisonment. An analysis of trafficking during the 2006-2008 period estimated that the trafficking rate is one cent per SNAP dollar.²⁶

Items That May Be Purchased With SNAP Benefits

Typically, participating households use their benefits in approved stores to buy food items for home preparation and consumption. In general, SNAP benefits may be redeemed for any foods for home preparation and consumption. SNAP benefits may not be redeemed for alcohol, tobacco, or hot foods intended for immediate consumption.

²⁵ For a state-by-state map displaying TANF/SNAP EBT status, please see USDA-FNS Office of Research and Analysis, *Building a Healthy America: A Profile of the Supplemental Nutrition Assistance Program*, April 2012, p. 33, <http://www.fns.usda.gov/ORA/menu/Published/SNAP/FILES/Other/BuildingHealthyAmerica.pdf>.

²⁶ Richard Mantovani and Hoke Wilson, *The Extent of Trafficking in SNAP 2006-2008*, USDA-FNS, January 2011, <http://www.fns.usda.gov/ora/menu/published/SNAP/FILES/ProgramIntegrity/Trafficking2006.pdf>.

According to the Food and Nutrition Act, SNAP may also be redeemed for seeds and plants to produce food for personal consumption. Elderly and disabled recipients and their spouses may redeem SNAP benefits for meals prepared and served through approved communal dining programs or home-delivered meal providers. SNAP may also be redeemed for meals prepared and served to residents of drug addiction and alcoholic treatment programs, small group homes for the disabled, shelters for battered women and children, and shelters or other establishments serving the homeless. In the case of certain remote areas of Alaska, benefits may be redeemed for procuring food by hunting and fishing (e.g., nets, hooks, fishing rods, and knives). According to annual benefit redemption data collected by USDA-FNS, in FY2011, almost 100% of SNAP benefits were redeemed in markets and stores with the remaining share, less than 1%, redeemed for meal services and delivery routes.²⁷

SNAP-Authorized Retailers

SNAP benefits may be redeemed only at authorized retailers. The SNAP program bases benefit redemption on the offerings and authorization of the retailer. The list of retailers that are authorized is varied—from supermarkets, to farmers markets, to convenience stores. **Table 4** displays the prevalence of each retailer type and the share of benefits redeemed at each type. Whether a retailer is authorized requires two general steps: (1) an application for authorization²⁸ and (2) passing a USDA-FNS administered inspection and authorization process. While there are many regulatory or administrative details, the statutory guidelines for the process are based upon the Food and Nutrition Act's definition of staple foods and inventory share requirements.²⁹ The four categories of staple foods are meat, poultry, or fish; bread or cereal; vegetables or fruits; and dairy products. Either an eligible retailer must offer:

- Three varieties of qualifying foods in each of the staple food categories, and
- perishable foods in at least two of the staple food categories.

Alternatively, more than 50% of the retailer's total sales must be from the sale of eligible staple foods (this latter definition is utilized to authorize specialty stores that may specialize in certain of the staple food categories, e.g., a bakery, produce store, or butcher).

Restaurants

For the most part, SNAP benefits are not redeemable at restaurants, recalling that the benefits are not redeemable for hot, prepared foods. However, there does exist a state restaurant option. Under this option, states can choose to authorize restaurants to accept SNAP benefits for homeless, elderly, and disabled individuals—populations that may have difficulty *preparing* food, in addition to purchasing food. According to information provided by USDA-FNS, California, Arizona, and Michigan currently operate state-administered restaurant programs serving their elderly, homeless, and disabled populations.³⁰ California operates a restaurant program in five

²⁷ USDA FNS, "SNAP's Benefit Redemption Division (BRD) Annual Report for Fiscal Year 2011," December 2011, <http://www.fns.usda.gov/snap/retailers/pdfs/2011-annual-report.pdf>.

²⁸ USDA-FNS website, <http://www.fns.usda.gov/snap/retailers/application-process.htm>.

²⁹ A very brief overview of the requirements of the statutory definitions and licensing process is provided here: <http://www.fns.usda.gov/snap/retailers/store-eligibility.htm>.

³⁰ Three jurisdictions also have recently begun to operate restaurant pilot programs. In 2009, 2010, and 2011, respectively, Florida, Puerto Rico, and Rhode Island started pilots.

counties, added in phases between 2003 and 2007. Arizona began its program in October of 2007. Michigan authorized one restaurant in 2000, a second in 2005, and the remainder as part of an expanded program in 2009 and 2010. As described above, the restaurants have to become licensed retailers by first entering into the contracts with the state agency and then getting authorization from USDA. FY2011 redemption data indicate that approximately \$36 million (or less than .1% of SNAP benefits) were redeemed at “meal delivery/private restaurants.”³¹

Farmers’ Markets

Farmers’ markets may become SNAP-licensed retailers.³² USDA reported that 2,445 farmers’ markets or individual farmers were authorized to accept SNAP benefits in FY2011, and they redeemed a total of \$11.7 million in SNAP benefits.³³ Compared to FY2010, this is an increase of over 51% in authorizations and over 55% in benefits redeemed. In FY2011, 51% of the direct-from-farm authorized retailers are in 10 states (Iowa, New York, Michigan, California, Mississippi, Massachusetts, Oregon, Ohio, Pennsylvania, and Missouri).

States, localities, and farmers’ market networks have created SNAP bonus incentive programs to target the redemption of benefits at farmers’ markets. These allow SNAP participants to redeem their benefits for more than “money on the dollar.” For example, a participant may exchange \$3 of benefits for a \$6 voucher to redeem at the market.³⁴ USDA-FNS, however, requires that the bonus funds be non-federal dollars.³⁵ Prior to 2010, markets had to apply to FNS for a waiver of the rules through the state SNAP agency. Beginning early in 2010, FNS allowed farmers’ markets that secured non-federal bonus incentive funding to be eligible through a blanket waiver, so markets now just report to an FNS field office that they are conducting a bonus incentive program.³⁶

³¹ <http://www.fns.usda.gov/snap/retailers/pdfs/2010-annual-report.pdf> (see .pdf p. 12)

³² For information see USDA, FNS, “SNAP: Learn How You Can Accept SNAP Benefits at Farmers’ Markets,” <http://www.fns.usda.gov/snap/ebt/fm.htm>.

³³ USDA FNS, “SNAP’s Benefit Redemption Division (BRD) Annual Report for Fiscal Year 2011,” December 2011, <http://www.fns.usda.gov/snap/retailers/pdfs/2011-annual-report.pdf>.

³⁴ For information on some examples of SNAP bonus incentive programs, see a news release from a private sponsor for a program in Rhode Island (“BankRI Supports Farm Fresh Rhode Island’s Bonus Bucks for Snap Program,” December 6, 2011, <https://www.bankri.com>) and a listing of Detroit farmers’ markets that participated in summer 2011 (“Bridge Card Bonus at Farmers’ Markets This Summer,” July 7, 2011, <http://www.doubleupfoodbucks.org/>).

³⁵ USDA-FNS, “Supplemental Nutrition Assistance Program—Bonus Incentives,” http://www.fns.usda.gov/snap/ebt/fm-scrip-Bonus_Incentives.htm.

³⁶ February 2012 e-mail communication with FNS-SNAP staff.

Table 4. Retailers Authorized and Benefits Redeemed by Retailer Type, FY2011

Retailer Types Are Displayed in Order of Each Type's Share

Retailers Authorized by Retailer Type			Share of Benefits Redeemed by Retailer Type		
Type of Retailer	# Authorized	% of all Retailers Authorized	Type of Retailer	\$ Redeemed (in millions) ^a	% of All SNAP Redemptions
Convenience Store	87,857	38.0%	Super Store	\$34,628.4	48.4%
Combination Grocery/Other	55,205	23.9%	Supermarket	\$24,501.0	34.2%
Supermarket	18,696	8.1%	Combination Grocery/Other	\$3,627.2	5.1%
Super Store	17,937	7.8%	Convenience Store	\$3,281.1	4.6%
Small Grocery Store	16,431	7.1%	Medium Grocery Store	\$1,526.7	2.1%
Medium Grocery Store	11,067	4.8%	Small Grocery Store	\$1,248.2	1.7%
Meal Services ^b	4,245	1.8%	Large Grocery Store	\$1,151.5	1.6%
Bakery Specialty Store	4,238	1.8%	Meat/Poultry Specialty	\$566.7	0.8%
Meat/Poultry Specialty	4,072	1.8%	Bakery Specialty	\$228.8	0.3%
Large Grocery Store	3,557	1.5%	Seafood Specialty	\$227.3	0.3%
Farmers' Market	2,445	1.1%	Meal Services (add note)	\$189.1	0.3%
Seafood Specialty	2,184	0.9%	Delivery Route	\$161.9	0.2%
Fruits/Vegetable Specialty Store	1,859	0.8%	Fruits/Vegetable Specialty Stores	\$131.9	0.2%
Delivery Route	1,077	0.5%	Military Commissary	\$87.8	0.1%
Non-Profit Food Buying Co-op	354	0.2%	Non-Profit Food Buying Co-op	\$37.8	0.1%
Military Commissary	190	0.1%	Farmers' Market	\$11.7	0.0%
Wholesaler	21	0.0%	Wholesaler	\$7.1	0.0%
TOTAL Retailers	231,435	100.0%	TOTAL Benefits	\$71,614.2	100.0%

Source: USDA-FNS Benefit Redemption Division 2011 Annual Report, <http://www.fns.usda.gov/snap/retailers/pdfs/2011-annual-report.pdf>.

Notes: The retailer classifications listed here are the labels utilized by the SNAP Benefit Redemption Division.

- a. Dollar amounts and total differ from the USDA-FNS source data due to rounding.
- b. The retailer types of Communal Dining Facility, Drug Alcohol Treatment Program, Group Living Arrangement, Homeless Meal Provider, Meal Delivery Service, Private Restaurant/Meal Delivery, Senior

Citizens' Center/Residential Building, and Shelter for Battered Women and Children have been consolidated to "Meal Services" for this CRS table.

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Acknowledgments

This report has been updated and adapted from the work of retired CRS Specialist in Social Policy, Joe Richardson, and Gene Falk, CRS Specialist in Social Policy.