THE THRIFTY FOOD PLAN AND PANDEMIC CHANGES TO SNAP: A GUIDE FOR ADVOCATES



SNAP: Recent changes dramatically impact this important nutrition program

The COVID-19 pandemic exacerbated food insecurity in the United States. SNAP, the largest domestic federal nutrition program, is designed to respond in times of crisis. Years of data and research demonstrates that SNAP is our nation's most effective anti-hunger program, serving as the front line of defense against hunger, poverty, food insecurity and the long-term negative health consequences they cause. SNAP was one of the first avenues used by legislators during the pandemic to assist those in need. As a result, pandemic response legislation made significant changes to SNAP benefits to quickly provide food aid to those in need and infuse much needed funds into the economy.

This resource will focus on significant changes impacting benefit levels in SNAP in the last two years:

- The 2021 USDA revision of the Thrifty Food Plan
- SNAP COVID-19 benefit increases

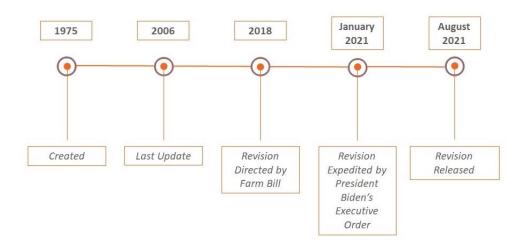
This resource will help advocates and others working on SNAP to better understand when and how the COVID-19 waivers affected SNAP benefits and how they intersect with the 2021 TFP revision. Additional information about SNAP waivers and flexibilities due to the COVID-19 public health emergency and corresponding legislation is available here: http://bestpractices.nokidhungry.org/resource/summary-covid-19-waivers-flexibilities-options-memos.

Thrifty Food Plan: Permanent Benefit Level Changes to SNAP

The Thrifty Food Plan (TFP) - developed by USDA in 1975 - is a formula designed to determine a minimal cost, nutritious market basket for a family of four. TFP uses a mathematical programming model seeking to meet nutritional requirements for groups of individuals distinguished by age and gender. In turn, the cost of these foods are developed into a meal plan and ultimately a market basket. TFP attempts to standardize shopping, food preparation, food costs across the nation, and food consumption patterns.

SNAP maximum benefit levels are based on the Thrifty Food Plan. Every October, the maximum SNAP allotment is adjusted based upon the cost of the TFP in the preceding June. As with most things created and not updated for nearly 50 years, the TFP became antiquated. It did not keep up with important changes, like evolving dietary guidelines, how food preparation and consumption has changed over recent decades, or sophistication in understanding of nutrition and health.

Thrifty Food Plan: Timeline



The 2018 Farm Bill required the TFP evaluation and revision to occur by 2022 and every 5 years thereafter. <u>President Biden called upon USDA</u> to act on the 2018 Farm Bill requirements to better reflect current realities for struggling families.

The 2021 Thrifty Food Plan revision is a significant change that will provide SNAP families with much needed long-term increased benefits for food. Prior to 2021, the TFP did not adjust the adequacy of the maximum SNAP benefit level other than inflation-adjusted costs increases. The <u>bipartisan 2018 Farm Bill</u> not only directed a revision to the TFP, it provided for USDA to consider additional factors for the first time in nearly 45 years. Every previous revision had been required to be cost neutral.

The 2018 Farm Bill directed USDA to consider 4 additional factors to determine the market basket:

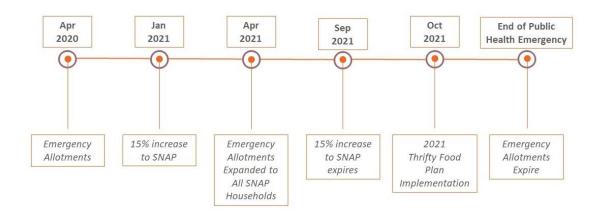
- Current food prices
- Food consumption data
- Food consumption patterns
- Dietary guidance

On August 16, 2021, USDA announced a <u>new formula</u> for the Thrifty Food Plan which <u>will result in an increase</u> in the monthly benefit for SNAP starting on October 1, 2021.

THRIFTY FOOD PLAN & THE COVID-19 SNAP BENEFIT WAIVER CHANGES

The Thrifty Food Plan is an important step in modernizing SNAP benefit calculations and improving benefit adequacy. Although modest, the TFP revision is the single largest permanent increase in SNAP program history. These changes come during a time when benefits have already been temporarily increased by Congress to address the impact of COVID-19 on skyrocketing food insecurity. There are a number of important changes which have impacted benefits in different ways for SNAP households since the start of the pandemic.

2020-2021 SNAP Benefit Level Changes



March - April 2020: SNAP Emergency Allotments

One of the first responses by Congress to address the food insecurity caused by the pandemic provided additional SNAP benefits to some but not all participating households. The Families First Coronavirus Response Act (FFCRA) provided emergency SNAP Emergency Allotments (EA) to SNAP households receiving less than the maximum monthly SNAP allotment. This change did NOT increase the maximum monthly SNAP allotment. For example, if a senior was receiving \$16/month in SNAP prior to implementation of this provision of FFCRA, due to the SNAPEA, that recipient now received \$194/month. This meant that people with the lowest incomes received no benefit increases since they were already receiving the maximum benefit level. The below table shows what this change looked like for a sample household receiving the minimum and maximum benefit amounts pre-pandemic.

Household Type	Pre-COVID Benefit Amount	New Benefit Amount (with EA)	Change in Benefit Amount since COVID
Household of 1, receiving the minimum benefit allotment amount pre-COVID	\$16	\$194	+\$178
Household of 1, receiving the maximum benefit amount pre-COVID \$194		\$194	\$0

^{*}Maximum and Minimum SNAP allotments are different for Alaska and Hawaii

Emergency Allotments were the first pandemic response increase to SNAP benefits.

October 2020: Cost of Living Adjustments

A small cost of living adjustment (COLA) in the SNAP benefit allotment occurs every year. USDA adjusts SNAP maximum allotments, deductions, and income eligibility standards at the beginning of each federal fiscal year. The federal fiscal year begins on October 1. The changes are based on the changes in the cost of living using the Thrifty Food Plan as a guide. The below table shows how this adjustment affected our sample households' benefit levels, building on the previous EA changes.

Household Type	Pre-COVID Benefit Amount (EA+COLA)		Change in Benefit Amount since COVID
Household of 1, receiving the minimum benefit amount pre-COVID	\$16	\$204	+\$188
Household of 1, receiving the maximum benefit amount pre-COVID	\$194	\$204	+\$10

December 2020- January 2021: 15% increase to SNAP beginning January 1, 2021

The Consolidated Appropriations Act, 2021, raised maximum allotments for SNAP recipients by 15% for six months from January 1, 2021 through June 30, 2021. This period was extended by the American Rescue Plan Act signed into law in March 2021 and the 15% increase is effective through September 30, 2021. This change provides the largest benefit increase to date for the lowest income families who were already receiving the maximum benefit level. The below table shows how this change impacted our sample households coupled with the prior changes.

Household Type	Pre-COVID Benefit Amount (EA+COLA+15% Increase)		Change in Benefit Amount since COVID
Household of 1, receiving the minimum benefit amount pre-COVID	\$16	\$234	+\$218
Household of 1, receiving the maximum benefit amount pre-COVID	\$194	\$234	+\$40

^{*}Maximum and Minimum SNAP allotments are different for Alaska and Hawaii

April 2021: Emergency Allotments expanded to include all SNAP recipients

In April 2021, Emergency Allotments became available to all SNAP recipients if there is a public health declaration at both the federal AND state level. Emergency SNAP allotments were originally provided to SNAP recipients receiving less than the maximum monthly allotment. SNAP recipients that were already receiving the maximum monthly allotment did not receive emergency allotments. SNAP monthly allotments are determined by income, expenses, and allowable deductions. Recipients who receive the maximum allotments have little to no income and are often the most in need.

Advocates in Pennsylvania argued that SNAP Emergency Allotments were not reaching those most in need of food aid. Community Legal Services in Philadelphia and pro bono co-counsel Morgan Lewis secured a litigation settlement resulting in significant emergency SNAP benefits to the needlest Pennsylvanians. Background information about the case, *Gilliam v. USDA*, can be found here. The following day, USDA took action to provide the expanded SNAP Emergency Benefits nationwide.

The action equaled nearly \$1 billion per month in additional food assistance to an estimated 25 million people. Starting in April 2021, households that had not received at least \$95 per month in increased benefits through emergency allotments during the pandemic - because they were at or close to receiving the current maximum allotment - were now eligible to receive additional benefits.

The below table shows how the lowest income recipients who were receiving the maximum benefit amount prepandemic now received a sizeable benefit increase more comparable to the increases that higher income SNAP recipients had seen previously.

Household Type	Pre-COVID Benefit Amount	New Benefit Amount (COLA +15% increase + EA for <i>all</i> participants)	Change in Benefit Amount since COVID
Household of 1, receiving the minimum benefit amount pre-COVID	\$16	\$234	+\$218
Household of 1, receiving the maximum benefit amount pre-COVD	\$194	\$329	+\$135

^{*}Maximum and Minimum SNAP allotments are different for Alaska and Hawaii

Due to the 2021 Thrifty Food Plan, SNAP benefits will increase, on average, \$36 per person or about \$1.20 per day

August 2021: Thrifty Food Plan

On August 16, 2021, USDA announced a new formula for TFP which will result in an <u>increase in the maximum</u> monthly benefit for SNAP starting on October 1, 2021. As a result of the Thrifty Food Plan re-evaluation, SNAP households will receive an increase in benefits of, on average, \$36 per person - or about \$1.20 per day. The maximum SNAP benefit will increase by 21 percent.

September 30, 2021: The 15% COVID increase to SNAP expires.

Immediately prior to the Thrifty Food Plan revision starting in October, this COVID boost to SNAP will end.

October 1, 2021: SNAP benefit adjustment reflecting TFP begins

The new formula for the Thrifty Food Plan will result in an <u>increase in the maximum monthly</u> benefit for SNAP starting on October 1, 2021. The timing of this increase will mitigate the loss participants would have otherwise experienced as a result of the 15% COVID increase expiring.

Household Type	Pre-COVID Benefit Amount	New Benefit Amount (EA for all participants + TFP)	Change in Benefit Amount since COVID
Household of 1, receiving the minimum benefit amount pre-COVID	e minimum benefit \$16		+\$234
Household of 1, receiving the maximum benefit amount pre-COVID \$194		\$345	+\$151

^{*}Maximum and Minimum SNAP allotments are different for Alaska and Hawaii

End of public health emergency (state or federal): Emergency Allotments expire

Right now, all SNAP households receive the maximum allotment, and persons previously receiving the maximum allotment receive an extra boost. When the federal public health emergency ends OR a state no longer has a public health emergency, the emergency allotments will also end, creating a very real "food cliff" for families. For example, a senior receiving \$250/month will experience a large decrease when the SNAP emergency allotments sunset and she will now receive \$20/month because she is only eligible for the minimum benefit level.

Household Type	Pre-COVID benefit amount	Final COVID Benefit Amount	New Benefit Amount after EA Expires	Change in Benefit Amount since COVID
Household of 1, receiving the minimum benefit amount	\$16	\$250	\$20	-\$230
Households of 1, receiving the maximum benefit amount	\$194	\$345	\$250	-\$95

^{*}Maximum and Minimum SNAP allotments are different for Alaska and Hawaii

When SNAP emergency allotments sunset a COVID "food cliff" for families will exist.

Advocates should work to make sure that families on SNAP are aware when the EAs will expire in their state and can expect to see a decrease in their benefits. The USDA allows states a "phase out month" after the state public health emergency ends. The phase-out month provides States one additional month of EA issuance after their state declaration has been terminated. For example, if a state declaration is terminated in the middle of August, the state would have September as their transition month and their final month for issuing EA. Support should be provided to families to help them adjust to the inevitable decrease in food benefits.