

# SNAP and the Food Retail Environment

## Background

SNAP provides benefits via an electronic benefit transfer (EBT) card, which participants can use at participating retailers to buy any foods and beverages except alcohol, tobacco products, hot foods, or foods that are “prepared and sold for on-premise consumption”.<sup>3,4</sup> In 2018, SNAP accounted for eight percent of all foods purchased in the U.S. for home consumption.<sup>5-7</sup> Congress grants USDA the authority to authorize retailers to accept SNAP EBT and establish eligibility criteria for retailer participation, such as guidelines for what foods must be offered or how retailers can engage in food marketing.<sup>9</sup>

This document will outline access to food retailers for people that use SNAP. It will also discuss the ways in which our food environment makes it hard to eat healthfully and strategies to strengthen SNAP retail environments that also have the potential to support all consumers that use those stores.

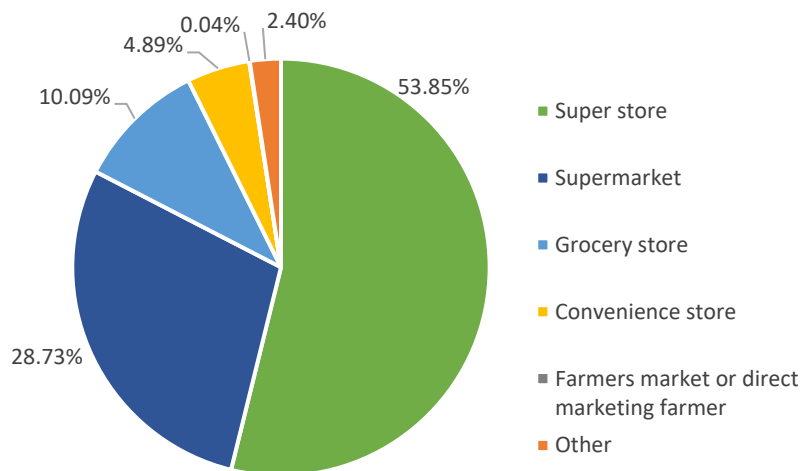
## Access to retailers

There are greater than 250,000 participating stores across the country. Almost half of SNAP authorized retailers are convenience stores, yet the majority (greater than 80%) of SNAP benefits are redeemed at superstores (e.g., Costco) and supermarkets (e.g., Giant).<sup>5, 12, 13</sup>

Traveling to and from a store may be difficult for SNAP participants who are elderly, immunocompromised, living with a disability, caregivers of small children, transportation burdened, and/or living in rural communities or food apartheid.<sup>15</sup> The 2014 Farm Bill authorized the SNAP Online Purchasing Pilot to allow retailers to accept SNAP benefits for online transactions to be picked up at the store or for delivery.<sup>2</sup> USDA rapidly expanded the pilot in response to the COVID-19 pandemic; as of late 2021, 47 states and Washington, DC were participating, with at least one company authorized for online SNAP in each state.<sup>17</sup>

Yet online SNAP purchasing and delivery services are not consistently available, especially in rural areas, and online SNAP redemptions only made up three percent of total EBT spending in

Fiscal Year 2020 SNAP Redemptions by Firm Type<sup>12</sup>



2020.<sup>18-20</sup> While nearly two-thirds of U.S. adults purchased groceries online during the COVID-19 pandemic, structural barriers may limit access to online grocery and delivery for people facing financial hardship.<sup>21, 22</sup> Minimal online SNAP redemption could be attributed to many factors, including few participating retailers, limited delivery zones, cost, the inability to use SNAP benefits to pay for service fees, and limited broadband access.<sup>18, 20, 23-26</sup>

In some states, the SNAP Restaurant Meal Program (RMP) allows individuals experiencing homelessness, living with a disability, and/or older adults to use their benefits to purchase prepared meals from qualified participating restaurants.<sup>27, 28</sup> In general, SNAP EBT cannot be used for purchase of hot foods or “foods prepared and sold for on-premise” consumption.<sup>3</sup> RMP facilitates access to these foods for people who face barriers to storing and preparing meals. RMP is voluntary and states can choose to initiate this program at any time. Currently, the program is implemented in a limited number of states.<sup>29-33</sup> After a disaster, states may also request a USDA waiver to allow impacted participants of Disaster-SNAP (or D-SNAP) to purchase hot and prepared foods.<sup>34, 35</sup>

### *Retailer in-store environments*

Food and beverage manufacturers pay grocery stores large amounts of money to promote and place their products in prominent store locations.<sup>36, 37</sup> These marketing practices disproportionately feature unhealthy items, like sugar-sweetened beverages (SSBs).<sup>38</sup> For example, a recent pilot study found that across 16 surveyed grocery stores in the D.C. metropolitan area, sugar-sweetened beverages (SSBs) appeared in an average of 30 locations and as many as 61 locations within one grocery store.<sup>39</sup> However, product, price, promotion, and placement marketing strategies can also be utilized to increase purchases of healthier items.<sup>40</sup>

**82 percent of consumers believe grocery stores should promote healthier items.<sup>1</sup>**

In the online space, marketing includes banner advertisements, product recommendations, search ordering, and branded site content that disproportionately feature foods that are high in sugar, sodium, and saturated fat.<sup>41</sup> Nutrition Facts panels and ingredients list are absent—or hard to access—for some online stores, and personalized marketing may contribute to inequities through targeting and exclusion.<sup>42-44</sup> Evidence suggests that online grocery purchases may contain fewer unhealthy products, such as candy, potentially due to online customers’ requisite advanced planning and reduced impulse purchases.<sup>45-48</sup> Yet shoppers may prefer to purchase some healthy perishable items, like fresh produce, in a physical store where they feel more control over the selection.<sup>48, 49</sup>

SNAP participants and other people with low incomes may be uniquely exposed to unhealthy food marketing and lack of quality, affordable, nutrient-dense food in nearby stores.<sup>50, 51</sup> For example, a New York-based study found that sugary drink marketing spiked during the time of the month that SNAP benefits were issued.<sup>50</sup> Lower income communities — which are more likely to have high SNAP participation — are less likely to be near retailers that offer nutrient dense foods at affordable price points.<sup>51-54</sup>

The SNAP retailer authorization process can encourage retailers to store and promote healthy foods that meet people’s needs. Yet there are no current standards that dictate what foods and beverages SNAP retailers can market, and there are only minimal standards for the products that retailers must offer (called stocking standards).

SNAP stores are required to stock a minimum number of food varieties in each of four “staple food” categories (fruits and vegetables, grains, dairy, and meat).<sup>55</sup> Specifically, SNAP stores must meet one of two staple food requirements, with most authorized under criterion A:

- Criterion A: must continuously stock three units of three different varieties for each staple food category. For two staple food categories, there must be at least one perishable variety; or
- Criterion B: must have more than 50 percent of its total gross sales from the sale of staple foods.

#### History of SNAP stocking standards

Since 2014, there have been multiple attempts to update SNAP stocking standards. The 2014 Farm Bill required retailers to stock an increased variety of staple foods and an increased number of perishable options.<sup>2</sup> In 2016, USDA proposed a rule that codified the 2014 standards and added a “depth of stock” requirement that retailers carry at least six units of each variety of staple foods.<sup>8</sup> USDA received significant opposition from the convenience store trade association and its 2016 final rule decreased the depth of stock updates.<sup>10, 11</sup> The final rule also amended the definition of “staple food” and allowed USDA to consider food access needs when making a SNAP authorization determination for retailers that don’t meet stocking requirements; a 2020 USDA Policy Memorandum outlines the framework used to make these “Need for Access” determinations.<sup>14</sup> In recent years, the convenience store trade association has also successfully lobbied Congress to insert a stocking standards appropriations rider that bars USDA from requiring stores to increase staple food varieties.<sup>16</sup>

There are also few guidelines or standards for online and restaurant retailers. All “internet retailers” (as USDA calls them) must abide by the same retailer stocking standards articulated above and meet several online purchasing requirements, including having an ecommerce presence and a website that can split SNAP from other transactions.<sup>56</sup> There are some principles related to data privacy that are similar to broader federal guidelines for e-commerce and digital marketing, which tend to be limited.<sup>43</sup>

To participate in RMP, restaurants must offer prepared foods at concessional prices.<sup>27</sup> There are not guidelines related to the types of foods restaurants should offer or promote.<sup>57</sup> Reviews of state RMP lists reveal that many participating restaurants are fast food companies like Dominos, McDonalds, Pizza Hut, and Subway.<sup>58-60</sup> California county human services offices have stated intentions to prioritize outreach to “nutritious and ethnically diverse restaurants” to help them sign up.<sup>61</sup>

## *Participant perceptions of SNAP retail environments*

- In a nationally representative survey of SNAP participants conducted in 2018, nearly 70 percent of SNAP participants had access to fresh fruits and vegetables, 3.5 percent indicated that the stores where they shopped had very little variety of fresh fruits, and 2.8 percent reported very little variety in fresh vegetables.<sup>62</sup>
- SNAP participants also note experiences of stigma when checking out at grocery stores, especially in states where the EBT card stands out.<sup>63-65</sup>
- Polling and focus groups with SNAP participants in Iowa, Massachusetts and North Carolina indicate support for strategies to ensure SNAP stores stock and promote a variety of nutrient dense options at affordable prices. Strategies of interest include: removing unhealthy items at the point-of-sale displays, reducing price promotions on less healthful foods, and offering 2-for-1 specials and coupons for healthy food.<sup>66-68</sup>
- In a national survey of adults in the United States (n = 1,808) with household income below 250 percent of the federal poverty level, 76.9 percent support subsidizing online grocery delivery fees and 84.4 percent support allowing purchase of hot prepared foods with SNAP.<sup>69</sup>

## *Research and Policy Opportunities*

### Research

- There is a need for more research to better understand how SNAP participants interact with the food environment, including whether SNAP participants are disproportionately targeted by unhealthy food marketing in-store and online.
- Research should center the insight of SNAP participants to better understand retail food environment barriers to healthy food access and to inform optimal retail strategies.
- Researchers can partner with retailers to pilot and/or evaluate healthy marketing interventions that could be integrated into SNAP policies. Behavioral economic strategies might include placement, price, and promotion strategies. For example, a checkout aisle that features healthy foods could reduce unhealthy impulse purchases and prominent placement of healthier items and a nutritionally balanced default online shopping cart can make it easier for shoppers to find healthy options online.<sup>70, 71</sup>

### Federal

- Federal policymakers can continue to explore ways to make online SNAP delivery more accessible. For example, the introduced [Expanding SNAP Options Act](#) would fund an online portal to connect SNAP participants with retailers and create a technical assistance center to expand retailer participation.
- USDA identified establishing SNAP retailer food marketing standards (i.e., “targeted merchandizing”) as one of two most promising approaches for promoting healthy purchases among SNAP participants, using the “product placement and promotion

strategies currently available to retailers to promote healthier products.” They propose a multi-year pilot study using scanner data, store environment assessments, and customer intercept surveys to assess the impact of product placement and promotion interventions.<sup>72</sup>

- Congress and USDA can consider options to increase the healthy food purchasing power of SNAP by allow nutrient-dense hot foods to be purchased with EBT.

#### States

- States and localities are ripe places for innovations and policies to help more SNAP participants access and utilize online shopping and delivery.
  - States could pilot strategies to help smaller retailers get on board and test the impact of waiving service fees
  - SNAP participants suggest offering discounts could be an adequate incentive to try online food shopping.<sup>26</sup> Integrating SNAP financial incentives for fruits and vegetables with online SNAP is a scalable policy solution that could facilitate online SNAP customer acquisition and retention.
  - Alternate delivery models for online SNAP purchases could also be considered, such as 2020 HFFI grantee Mississippi Delta Online Delivery Grocery Program’s hub-and-spoke model.<sup>73</sup>
- States and localities can enact healthy retail policies to encourage grocery stores to stock and market the nutritious foods that shoppers want, in-store and online. Retail policies at the state and local level can also help to inform and lay the groundwork for improvements to SNAP retailer authorization standards.<sup>74</sup>
  - In 2008 the first staple foods ordinance was adopted in Minneapolis, Minnesota to require grocery stores to sell a certain amount of fruits and vegetables, whole grains, eggs, and low-fat dairy.<sup>75</sup> After several years of monitoring and evaluation, the city improved upon the policy by adding technical assistance for stores, clarifying the standards, and aligning the standards with cultural preferences.
  - In 2020, the city of Berkeley, California approved the nation’s first healthy checkout policy, which requires stores to place healthy items—like fruit, nuts, and whole grains—in the checkout aisle.<sup>76</sup>
  - States could pilot behavioral economic strategies in the online food retail environment. The feasibility and impact evidence generated could then inform a future large-scale pilot of SNAP-authorized retailer food marketing standards. SNAP-Ed could further support a healthy online and in-store food environment through aligned interventions such as promotion campaigns, healthy shopping lists, and virtual dietitian access.

## *Additional Resources*

- Adam et al. 2016. [What is the effectiveness of obesity related interventions at retail grocery stores and supermarkets? — a systematic review](#)
- Bleich et al. 2021. [Strengthening the Public Health Impacts of SNAP: Key Opportunities for the Next Farm Bill](#)
- Bucher et al. 2016. [Nudging consumers towards healthier choices: a systematic review of positional influences on food choice - PubMed \(nih.gov\)](#)
- CSPI. 2019. [Comment to USDA re: SNAP Retailer Stocking Standards](#)
- Haynes-Maslow. 2018. [Rural corner store owners' perceptions of stocking healthier foods in response to proposed SNAP retailer rule changes](#)
- Hecht et al. 2020. [Developing a National Research Agenda to Support Healthy Food Retail](#)
- Hosler et al. 2019. [Effect of Change in the Supplemental Nutrition Assistance Program Guidelines on Vendor Participation and Availability of Fresh Produce](#)
- Houghtaling et al. 2019. [Rural independent and corporate Supplemental Nutrition Assistance Program \(SNAP\)-authorized store owners' and managers' perceived feasibility to implement marketing-mix and choice-architecture strategies to encourage healthy consumer purchases.](#)
- Karpyn et al. 2020. [IJERPH | Free Full-Text | Improving Consumption and Purchases of Healthier Foods in Retail Environments: A Systematic Review \(mdpi.com\)](#)
- Karpyn et al. 2018. [Examining the Feasibility of Healthy Minimum Stocking Standards for Small Food Stores](#)
- Laska and Pelletier. 2016. [Minimum Stocking Levels and Marketing Strategies of Healthful Foods for Small Retail Food Stores](#)
- Moran et al. 2021. [Promoting Equitable Expansion of the SNAP Online Purchasing Pilot](#)
- Office of Disease Prevention and Health Promotion. [Counting Carrots in Corner Stores: The Minneapolis Staple Foods Ordinance](#)
- Powell et al. 2019. [Changes to SNAP-authorized retailer stocking requirements and the supply of foods and beverages in low-income communities in seven U.S. states](#)
- Thorndike and Sunstein. 2017. [Obesity Prevention in the Supermarket—Choice Architecture and the Supplemental Nutrition Assistance Program \(nih.gov\)](#)
- USDA FNS Office of Policy Support. 2014. [Approaches for Promoting Healthy Food Purchases by SNAP Participants](#)
- USDA. 2018. [Eligibility Requirements for SNAP Retailers: Balancing Access, Nutrition, and Integrity](#)

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