



HAWAI'I APPLESEED
CENTER FOR LAW & ECONOMIC JUSTICE

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HAWAI'I SNAP

Challenges and Opportunities for Improving
Food Security for Hawai'i Residents



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Hawai'i Appleseed envisions a Hawai'i that puts its people first—a Hawai'i where everyone can meet their basic needs while living happy, healthy and creative lives. We advocate for economic justice for and with Hawai'i's people.

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No Kid Hungry Hawai'i is a public-private coalition working to end childhood hunger. The partnership between Share Our Strength and Hawai'i Appleseed is ending childhood hunger in Hawai'i by ensuring kids get the food they need.

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INTRODUCTION



The Supplemental Nutrition Assistance Program

(SNAP) is one of the federal government's most important and effective anti-hunger programs, helping more than 195,000 Hawai'i residents purchase food.¹ SNAP provides recipients with a monthly benefit that they can use to purchase food items (excluding alcohol and hot meals) from food retail outlets such as grocery stores, farmers markets and food hubs.

To ensure Hawai'i residents have access to the food they need to survive and thrive, it is important to ensure our state is making the most of the SNAP program. The challenge to do so increased with the arrival of the pandemic as both need and SNAP usage grew.

In October of 2019, 79,960 households in Hawai'i received SNAP. By May of the following year, this number had risen sharply to 96,580. The level of SNAP participation during the pandemic peaked at 112,461 in August of 2021, but participation rates in 2022 are still higher than rates before the pandemic.²

The purpose of this report is to attempt to capture a snapshot in time of how well the program is adjusting to this spike in need by gathering feedback from recipients,

outreach providers, and eligibility workers at the state Department of Human Services (DHS) in Hawai'i.

With this data, we identify the most important challenges and opportunities facing SNAP and recommend solutions that can be implemented by advocates, providers, policymakers, and administrators.

This report is separated into three sections:

- First we examine the public data on Hawai'i's SNAP population, including statistics on the age and ethnicity of the program's participants.
- Second, we convey the experiences reported by SNAP recipients during the interview process.
- Finally, we highlight a number of challenges and opportunities that arose during our discussions with service providers, SNAP recipients, and DHS staff.

It is our hope that the recommendations presented herein will be a guide for administrators, providers, and advocates wishing to ensure that SNAP is conveniently accessible to all eligible Hawai'i residents.

SNAP IN HAWAI‘I: KEY RECOMMENDATIONS

Hawai‘i Appleseed makes the following recommendations for improving access, timeliness, and efficiency.

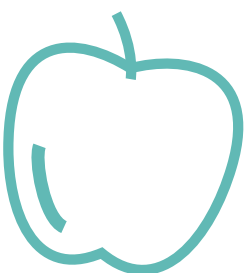


IMPROVING DATA ACCESS



1. Expand the public’s access to SNAP enrollment data through the creation of a data request portal monitored by the state office.
2. Provide annual county-level reports on the DHS website with statistics on participation and benefits distributed, broken down by ethnicity, age, and citizenship status.

EXPANDING NUTRITION INCENTIVES



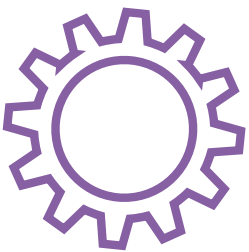
1. Acquire \$3 million in state and/or county matching funds for Hawai‘i’s 2023 Gus Schumacher Nutrition Incentive Program (GusNIP) application, which would cover expansion to all Foodland stores statewide.
2. Advocate for sustained federal funding for GusNIP through the 2023 Farm Bill and the American Rescue Plan.
3. Expand signage and in-store marketing for nutrition incentives.

EXPANDING PROGRAM ELIGIBILITY



1. Advocate for higher SNAP eligibility income thresholds at the federal level.
2. Support the Biden Administration's efforts to expand eligibility for college students and other underserved groups.
3. Pass state legislation to remove the partial restriction on individuals with felony drug convictions.
4. Expand eligibility to Compact of Free Association (COFA) residents.
5. Prepare for economic changes that would result in mass benefits cliffs. Providers and advocates should work closely with DHS and other agencies to identify looming changes—such as loss of federal aid, minimum wage increases, or a cost of living increase—that could lead to abrupt loss of benefits for large swaths of SNAP recipients.
6. Implement the Elderly Simplified Application Project (ESAP) to facilitate enrollment and reduce churn among Hawai'i's senior population.
7. Maximize deductions, in particular for medical and dependent care.
8. Replace the Thrifty Food Plan with the Low-Cost Food Plan.

IMPROVING EFFICIENCY & CAPACITY



1. Improve line staff retention by providing incentives and advancement opportunities.
2. Expedite the Integrated Benefits Eligibility System rollout.
3. Connect the SNAP and the Women, Infants and Children program eligibility systems.
4. Create a new business process engineering manager position at Benefit, Employment & Support Services Division (BESSD) of the Hawai'i State Department of Human Services (DHS) to oversee and update processing center operations.
5. Allocate increased funding for contracted outreach providers, tied to expanding outreach to difficult-to-reach populations such as those in unstable housing.
6. Resume and expand DHS' outreach efforts by adding a branch-level outreach manager position.
7. Facilitate quarterly outreach convenings, with a structured agenda that allows sharing but also specifically identifies needs and opportunities.

SNAPSHOT: HAWAII'S SNAP POPULATION

REACHING ELIGIBLE POPULATIONS

Figure 1. Hawai'i consistently performs about the same as the national rate for reaching eligible populations.³

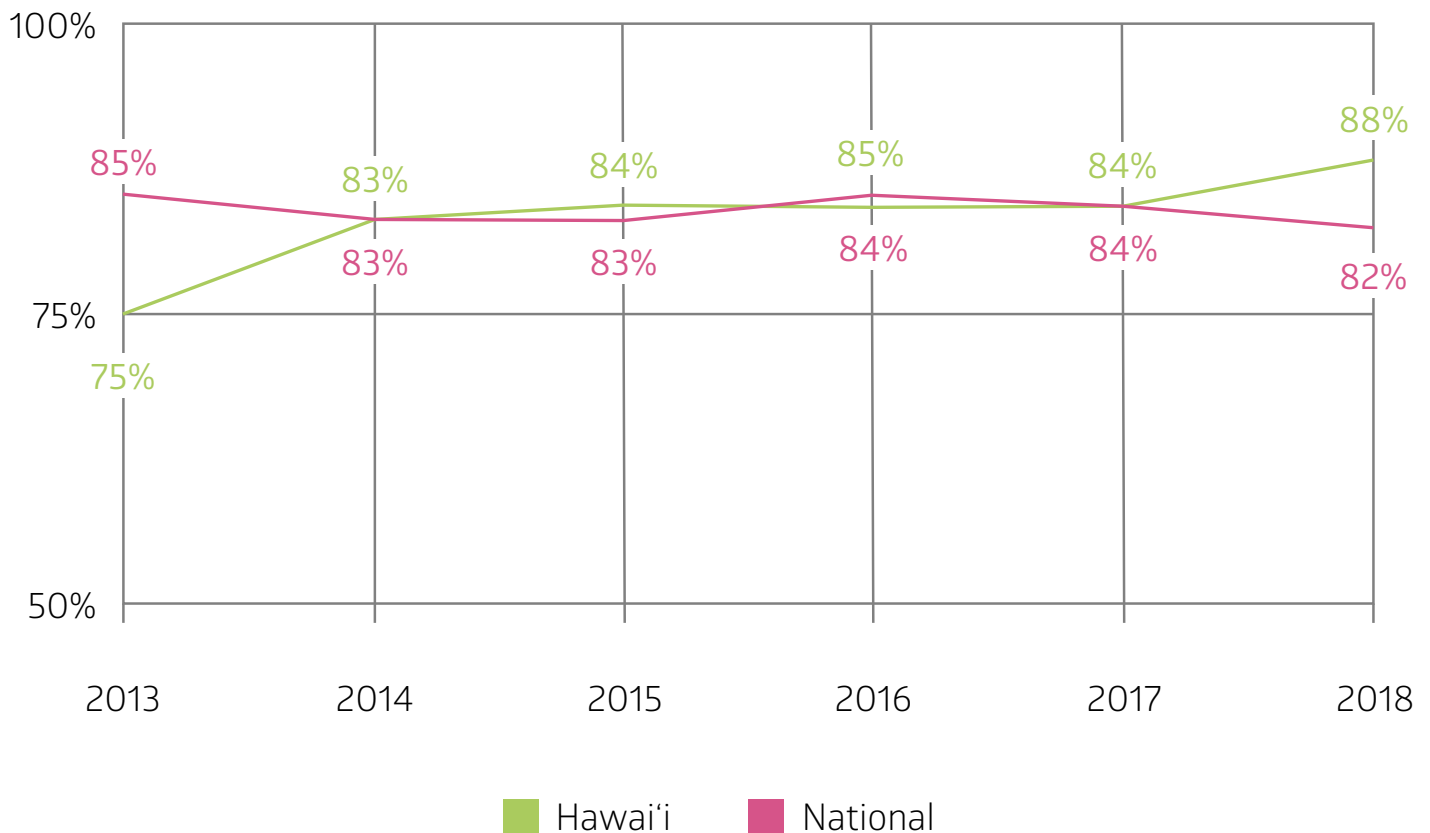
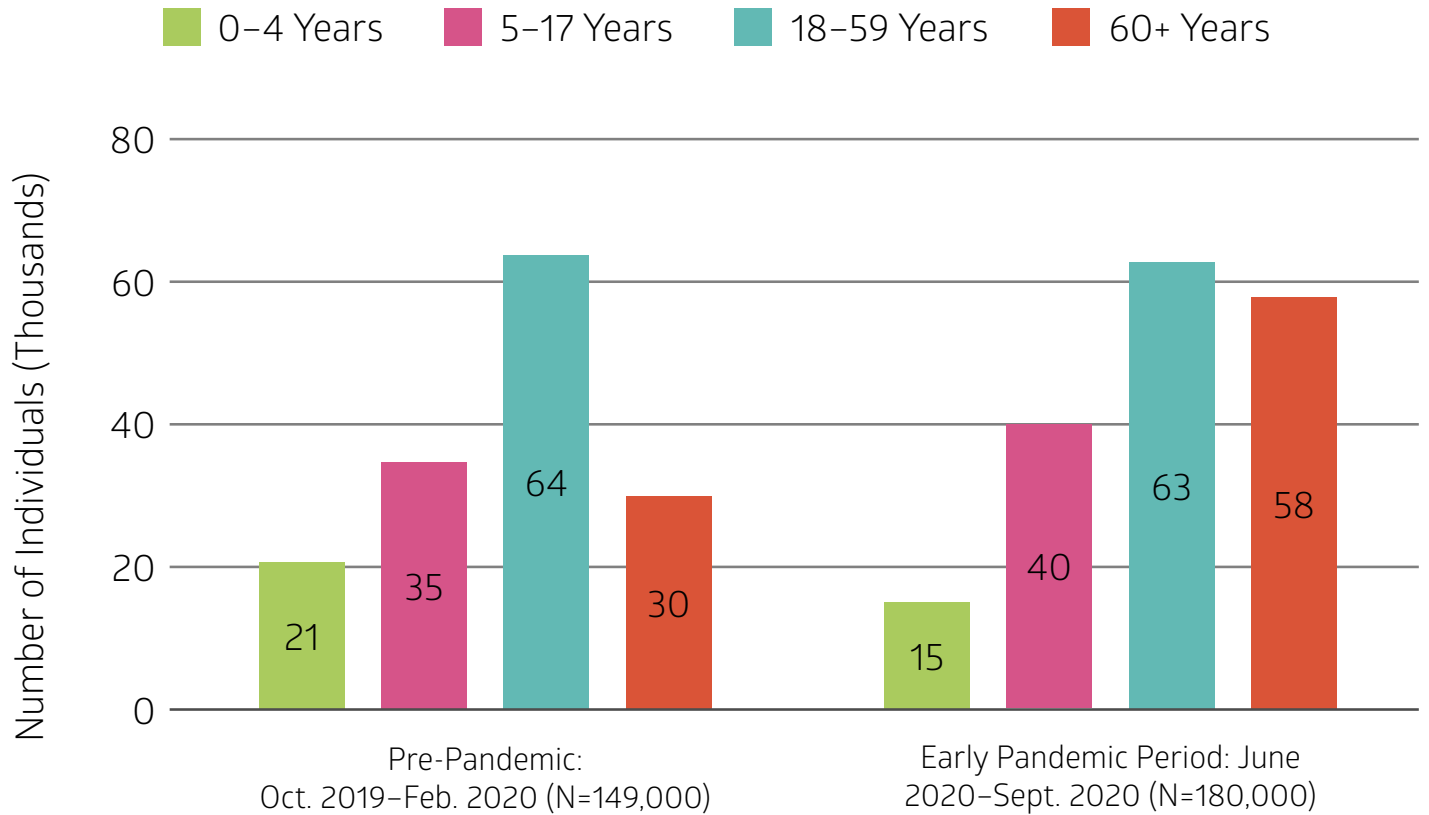


Figure 1. Going back to 2013, Hawai'i has been on-par with the national average for reaching eligible populations with SNAP. However, the United States Department of Agriculture (USDA) has a three to four year lag on reporting this measure, so it remains to be seen whether Hawai'i was able to retain this performance through the pandemic. The most recent data (2018) tells us that Hawai'i was reaching 88 percent of its eligible population, compared to a national rate of 82 percent.⁴

AGE DISTRIBUTION OF SNAP USERS

Figure 2. Age distribution of Hawai'i SNAP recipients, pre- and post-pandemic⁵



Age Distribution of Individuals

Figure 2. Prior to the pandemic, adults over the age of 60 made up about 20 percent of all SNAP users in Hawai'i. In the early stages of the pandemic, this proportion jumped to one in three—an overall 93 percent increase in the total number of seniors receiving SNAP.

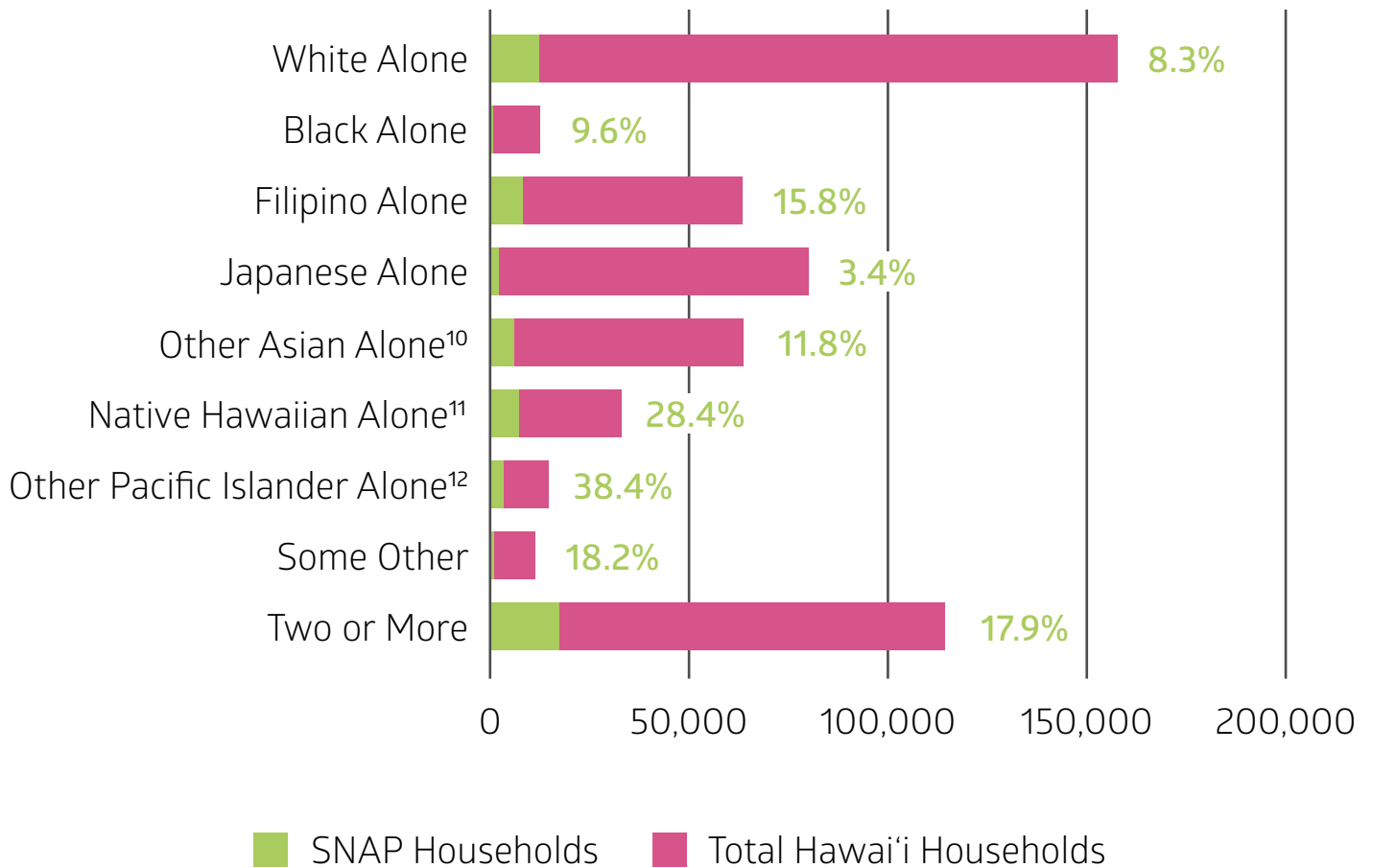
“PRE-PANDEMIC, HAWAI'I SNAP WAS REACHING 59% OF ELIGIBLE SENIORS, COMPARED WITH ONLY 44% SERVED NATIONALLY.”

Historically and nationwide, we know that seniors participate in SNAP at much lower rates than other age groups, for reasons outlined in our prior report, “[Feeding Our Kūpuna](#)” (2020).⁶ The most recent data (from 2018; pre-pandemic), shows that Hawai'i

reaches 59 percent of eligible seniors (compared with only 44 percent nationally).⁷ However, we are unable to say whether the jump in participation in the early pandemic days was from seniors that were previously eligible or newly eligible.

ETHNIC COMPOSITION

Figure 3. Proportion of total Hawai'i households using SNAP by race/ethnicity^{8,9}



In total, 12.6 percent of Hawai'i's households receive SNAP benefits. However, the percentages of each ethnicity that participate in SNAP vary considerably. In particular, Native Hawaiian and Other Pacific Islander households have higher SNAP participation rates than other ethnic groups in Hawai'i.

NATIVE HAWAIIANS

While Native Hawaiians once nurtured prosperous, self-sufficient food systems, following colonization

and the illegal overthrow of the Hawaiian Kingdom, Native Hawaiians lost considerable access to their native lands and have been unable to practice their traditional agriculture and way of life as they had before.¹³ The consequences of these events continue to manifest in significant disparities in wealth and economic security relative to other ethnic groups. These disparities show up in SNAP participation rates as well.

According to state-level data, single-race Native



Hawaiian households comprise 6.3 percent of Hawai‘i’s households, and 28.4 percent of these households participate in SNAP.¹⁴ In addition, after factoring in mixed-race individuals, 23.7 percent of Native Hawaiian (alone or in combination with other races) households receive SNAP benefits. This contrasts sharply with the data for single-race Japanese households, of which only 3.4 percent participate in SNAP.

OTHER PACIFIC ISLANDERS

Other Pacific Islanders living in Hawai‘i include non-Hawaiian Polynesians, Micronesians and Melanesians. The “Polynesian” subcategory includes Samoans, Tongans, Fijians, and many others, while

the Micronesian population predominantly consists of citizens from three nations that are part of the Compact of Free Association (COFA): The Marshall Islands, Palau, and the Federated States of Micronesia.

As shown in **Figure 3**, Pacific Islanders make up about 2.2 percent of Hawai‘i’s households, and 38.4 percent of these households are enrolled in SNAP. The reasons for this disproportionate SNAP participation rate are rooted in similar, but different, historical inequities than those of Native Hawaiians. One major root cause is U.S. militarization of these island nations, which has made some sections of land uninhabitable and led to health problems and displacement of indigenous food systems.

WHY WE NEED SNAP

This section examines some of the experiences recounted by interviewees who have received SNAP. These themes and stories underline the importance of SNAP, demonstrating that it can be a crucial lifeline to working families with low incomes.

HAWAI'I'S HIGH COST OF LIVING

“FIVE OUT OF THE SIX RECIPIENTS WE INTERVIEWED WHO WERE UNDER THE AGE OF 40 SAID THEY WERE CONSIDERING MOVING TO THE CONTINENTAL U.S. FOR A LOWER COST OF LIVING.”

In 2020, Hawai'i continued to have the highest cost of living in the United States, making it more difficult for working families to get by.¹⁵ All of the interviewees—from DHS eligibility workers to SNAP recipients—commented on how expensive it is to live in Hawai'i.

This high cost of living has been driven by many issues, including the lack of affordable housing, high costs of energy, and a heavy reliance on imported goods. Consequently, Hawai'i has seen rising levels of outmigration in recent years.¹⁶ In fact, five out of the six recipients we interviewed who were under the age of 40 said they were considering moving to the continental U.S. for a lower cost of living.

“I'm hoping to buy one of my Hawaiian Homelands houses here before I leave, but I highly doubt it. Everyone's leaving, unless you live in low-income housing or Hawaiian Homelands.”

“Honestly, my hope for the future is to get a good

enough job to where I don't need SNAP. Even if I have to move to the mainland for a smaller living wage, a smaller cost of living. I don't want to have to depend on SNAP...Right now it's my only choice because Hawai'i is so expensive.”

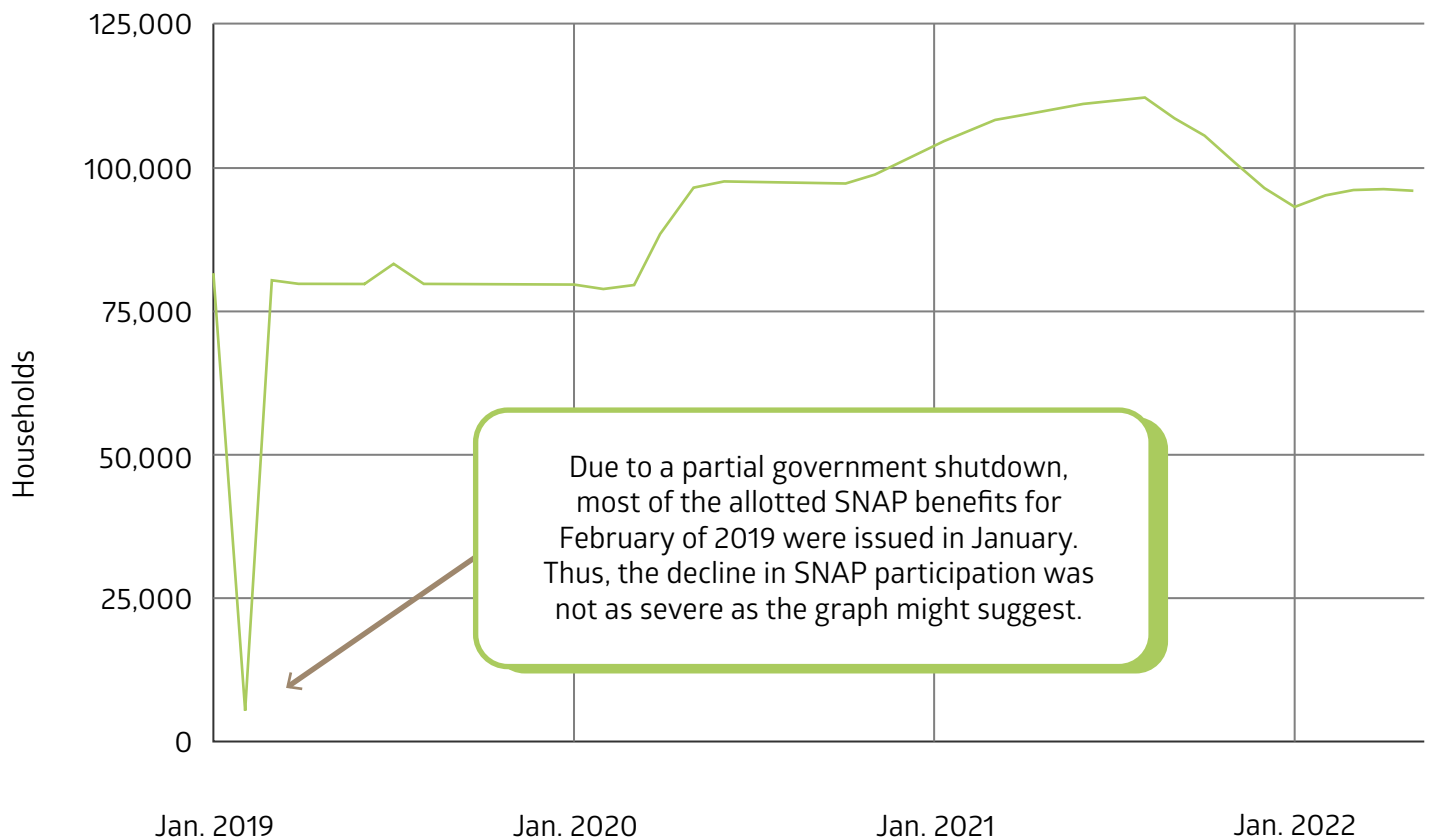
Several of the service providers mentioned unique challenges in reaching seniors with SNAP. Many are no longer able to work full-time, and are heavily affected by the high cost of living in Hawai'i.

“That's why I wanted to go into those senior places. 'Cause just by chance, I know they would qualify.”

With these challenging circumstances in mind, the recipients we interviewed described SNAP as being a “blessing,” with many of them acknowledging that they would not be able to pay their bills on time without it. In line with the purpose of the program, SNAP has an enormous impact on recipients' ability to purchase nutritious food.

HARD CHOICES

Figure 4. Household SNAP Participation, Hawai'i (January 2019–May 2022)^{17, 18}



Since the start of the pandemic, widespread unemployment and the rising cost of living have also led to increased food insecurity throughout Hawai'i.

At the beginning of 2022, 9.4 percent of adults lived in households that did not have enough food to eat over the past week, climbing to 13.8 percent by the last week of July, 2022.¹⁹

Aloha United Way's 211 helpline, which connects clients to various assistance programs, recorded that 11.1 percent of its callers from June 7, 2019 through September of 2022 requested food-related

assistance.²⁰ These numbers correspond to the increases in SNAP enrollment over that period.

SNAP recipients were grateful for the temporary boost in their benefits authorized by the public health emergency declaration as a result of the pandemic, as it gave them more leeway to eat healthy, full meals that they would not be able to afford on their own.

In 2021, Congress raised all benefits by 15 percent and allowed recipients to claim the maximum benefit for their household size.²¹ A recipient clarified that SNAP covers families' basic needs—it is not a "luxury" that

WHY WE NEED SNAP

allows them to eat unreasonably expensive meals.

“It’s a box of chicken and rice and vegetables, you know? It’s not like I’m using it to go out and eat at Ruby Tuesday’s. I’m using it to make food at home for my family.”

In addition, the majority of recipients said that they would not be able to pay all of their bills without

SNAP. One recipient outlined the dilemma she would face if she no longer received her benefits.

“I wouldn’t be paying a bill—at least one or two bills, to be able to feed everybody. When I wasn’t getting [SNAP] EBT, I didn’t pay my electric, and my electric went up to almost \$1,000. So it is very hard for me to put money away, and the kids are always so hungry ‘cause they’re growing.”

DIET QUALITY AND HEALTH CONCERNS



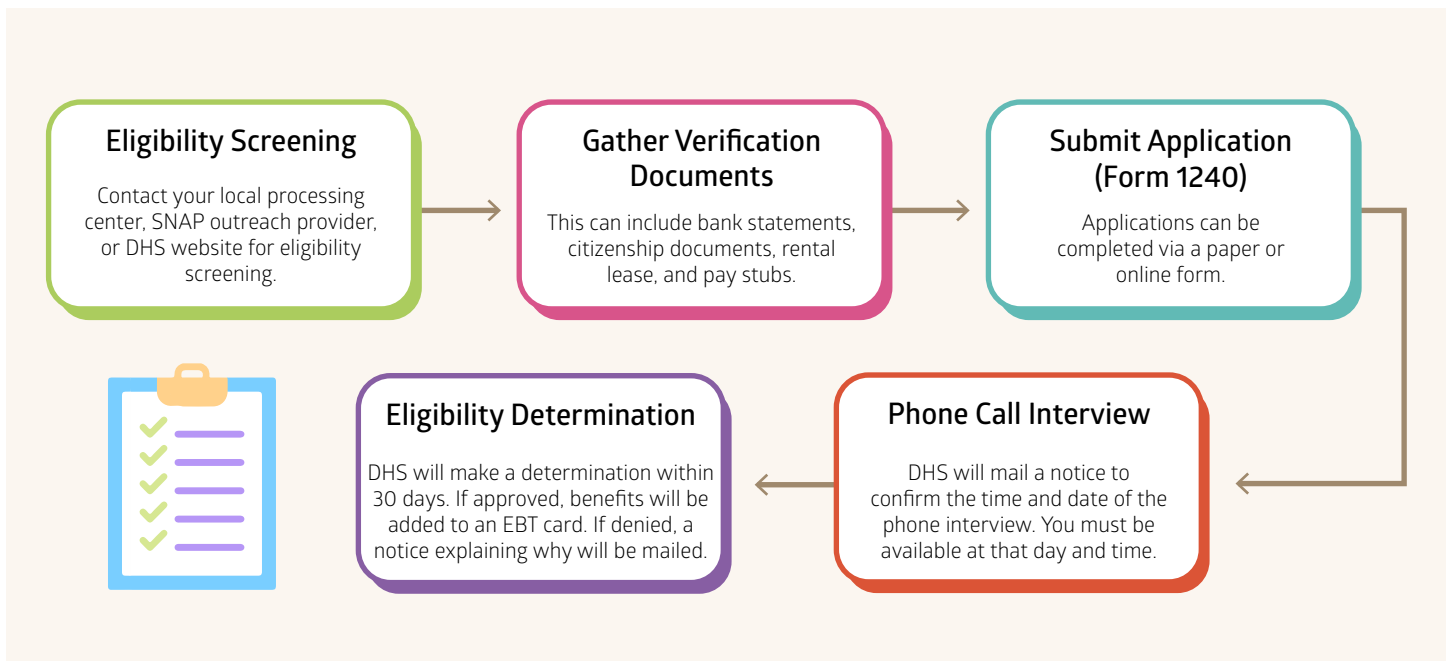
For many recipients, SNAP is integral to their dietary needs. Without subsidies, nutritious meals are typically more expensive than the less nutritious alternatives. As a result, lower-income families are inclined towards cheaper meal options that are less conducive to their overall health.

“It would be very difficult [to get by without SNAP].

My doctor would lose her mind because my [blood sugar levels] would go crazy.

“Because healthy food, low in carbs, is more expensive. A bag of rice is \$15.90, and that would last me a whole month. But guess what? I can’t eat that. I have to eat certain foods that are way more expensive. So the SNAP helps, it does.”

APPLICATION AND RECERTIFICATION: THE CLIENT EXPERIENCE



While SNAP is one of the most important safety net programs we have, it can be a challenge to apply, get approved, and remain in the program. Applying for SNAP requires many steps and pieces of documentation, as shown in the above flow chart. After completing the application, the applicant must then complete a phone interview with DHS processing center line staff to finalize their application.

Although some recipients and eligibility workers we

interviewed appreciated the interview requirement as an opportunity to connect client and staff, others shared that it can be both a challenge for DHS staff to manage, and for applicants to comply with.

“I eventually got my letter that told me my interview for SNAP would be the following day at 8:30 a.m. Meaning I had approximately 12 hours to ensure I could clear my schedule for an undetermined amount of time.”

LANGUAGE ACCESS AND READABILITY

In Hawai'i, there are a number of populations with either a majority or significant minority claiming limited English proficiency.

The languages with the lowest percentages of speakers who cannot speak English “very well” include Korean (60 percent), Vietnamese (69 percent), and Mandarin and Cantonese (61.25 percent).²² To support access among these and other groups, DHS offers interpretation services for SNAP in 17 languages.²³

Despite this, it is still difficult for those with limited English proficiency to navigate the process. Even

some English-speaking participants find the phrasing of certain questions on the SNAP application to be difficult to understand.

“With the way that they word it out, if I didn’t have the drop-in center staff, I wouldn’t be able to do it by myself. A lot of the questions are very documented and formal.” — SNAP Recipient

“[Our clients] always express to us how the application is very long, it’s very wordy, and sometimes confusing for them to understand what the question is asking.” — SNAP Outreach Provider

NEED HELP IN ANOTHER LANGUAGE? CHOOSE A LANGUAGE BELOW

English	廣東話	Chuukese
Français	Deutsche	‘Ōlelo Hawai‘i
Ilokano	日本語	한국인
国话	Marshallese	Samoan
Español	Tagalog	Tongan
Tiếng Việt	Visayan	

A re-creation of the language selection menu on the Hawai'i State Department of Human Services' Public Assistance Information System website.

DOCUMENTATION REQUIREMENTS

Applying for SNAP requires multiple documents, including proof of identity, residence, citizenship or lawful immigration status, number of household members, all forms of income, and proof of expenses such as childcare, utilities and healthcare.

It can be a challenge for some applicants to keep track of their required eligibility documentation—in particular for individuals without stable housing. Sometimes the process to acquire the necessary documents can take months.

“So many people have trouble getting the verification documents. They qualify for SNAP, but gosh! Getting a birth certificate from a state they haven’t been in decades? These people are living off the grid, they don’t have an ID, they don’t have a driver’s license. If DHS could somehow interface with other agencies to get these documents, that would be awesome.”
— SNAP Outreach Provider



RECERTIFICATION AND CHURN

SNAP enrollment is not a permanent status. In order to remain enrolled, recipients must complete both six-month and annual reports verifying their continuing eligibility—a process known as recertification.

Failure to submit the annual report is the number one reason that individuals are denied continued enrollment and must re-apply, a phenomenon known as “churn.” Our interviews confirmed that completing annual recertification requirements can be stressful.

A recipient recounted the difficult experiences many of her friends had with SNAP in the past, explaining why they did not want to reapply for their benefits after losing them.

“They remember how strenuous it is to just fill out the application, get the documents in, then make sure you get in for the interview...People don’t know, but having SNAP is like having a frickin’ part-time job... you can only get the help for a month or two.”

A SNAP recipient who missed his recertification deadline, lost his benefits, and was finally able to re-enter the program two years later with the help of an outreach provider described the difficulty in contacting the SNAP office for help:

“It was a nightmare. I couldn’t get through [to the office]. I called every day.”

PROFILE

NAME: TOM

LOCATION: EAST HAWAI‘I ISLAND



Tom had been on SNAP for five years when he received a letter from DHS informing him that he was \$30 over the income limit. However, after factoring in his medical bills from three surgeries, Tom believed that he should have been well beneath this cutoff.

He contacted a SNAP outreach provider, who agreed that Tom’s medical expenses did not seem to be properly accounted for. Despite being told by a DHS worker that he would likely lose an appeal, Tom proceeded to file an appeal against DHS’ decision.

Throughout this ordeal, Tom said that he was unable to reach SNAP representatives over the phone. Tom recommended that we “call the toll free number and see how long it takes to get a human being.”

One of the letters that Tom received from DHS was postmarked 8 days after the date printed on the letterhead, allowing him less than a week to address its demands. To ensure timely communication, Tom asked DHS personnel to send him letters by email, but they claimed that they were not “set up” for email correspondence.

After nearly giving up on his appeal, Tom eventually managed to re-qualify for SNAP. He expressed his gratitude for the SNAP outreach worker who had helped him along the way, exclaiming that she gives a “hell of an effort to make sure that people qualify [for SNAP].”

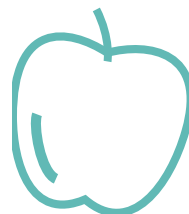
“SNAP is a great program, they just gotta manage it better.” He believed there were internal miscommunications at DHS that needed to be sorted out.

CHALLENGES AND OPPORTUNITIES

This section examines the issues that were frequently mentioned by service providers, SNAP recipients, and DHS staff during our interview process. We have organized these issues into four broad categories. Each section outlines challenges raised by interviewees, which are then followed by recommendations for improvement.



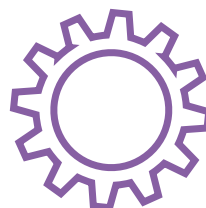
IMPROVE DATA ACCESS



EXPAND NUTRITION INCENTIVES



EXPAND PROGRAM ELIGIBILITY & PARTICIPATION



IMPROVE EFFICIENCY & CAPACITY

IMPROVE DATA ACCESS



RECOMMENDATIONS

1. **Data request portal:** Expand the public's access to SNAP enrollment data through the creation of a data request portal monitored by the state office.
2. **Annual county-level reports:** Provide annual county-level reports on the DHS website with statistics on participation and benefits distributed, broken down by ethnicity, age, and citizenship status.

There is a wealth of SNAP data available from a variety of different sources. Primary data sources include the U.S. Department of Agriculture, the Hawai'i Department of Human Services, and the U.S. Census Bureau. However, navigating this data landscape to find meaningful trends can be challenging, and data sources often contradict one another.

REPORTING LAGS

Some analyses aggregate years, resulting in a multi-year reporting lag. One of the most critical measures of state performance—the percentage of eligible people enrolled—is only reported by the USDA, and relies on three-year aggregate analyses. The most recent data is from before the pandemic, in 2018. The same is true for participation rates among eligible seniors.

COUNTY AND ISLAND-LEVEL DATA

All of the outreach providers interviewed agreed that SNAP enrollment data provides valuable insights on the state of the program, allowing them to better

understand the populations they serve. Providers would like to have greater access to disaggregated data for each county, and age and ethnicity were highlighted as the greatest need.

“When we’re writing grants, we’re trying to get the most updated info on who’s using SNAP specifically for [our] county. I know there’s a lot for all the state...How much money is coming to [our community] through the SNAP program? Even for each ahupua’a?” — SNAP Outreach Provider

DHS offers the most granular geographic data of the three sources (and also the most recent) through their monthly timeliness and participation reports. These are published on their website in pdf format.

These monthly reports offer information on the number of applications received and approved, as well as timeliness of processing, broken down by processing center. They also offer the total benefits issued and total participation (households and individuals) by island. However, no demographic information is provided.

EXPAND NUTRITION INCENTIVES



RECOMMENDATIONS

1. **Acquire state and/or county matching funds:** The state legislature should appropriate \$3 million in matching funds for Hawai'i's 2023 Gus Schumacher Nutrition Incentive Program (GusNIP) application, which would cover expansion to all Foodland stores statewide.
2. **Advocate for sustained federal funding for GusNIP through the 2023 Farm Bill and the American Rescue Plan.**
3. **Expand signage and in-store marketing:** Educate and encourage DA BUX participating grocery stores to utilize prominent and creative in-store marketing and signage.

“IN HAWAI’I, THE STATE LEGISLATURE HAS ONLY PROVIDED \$100,000 APPROPRIATION OVER TWO YEARS TO SUPPORT DA BUX PROGRAM, OR LESS THAN 3% OF THE TOTAL PROGRAM OPERATING COST FOR FISCAL YEAR 2021.”

The Double Up Food Bucks program (known in Hawai'i as DA BUX; www.dabux.org) partners with food retailers statewide to provide a 50 percent discount for Hawai'i grown fruits and vegetables to SNAP recipients. The program has been highly successful since its statewide launch in 2019, saving Hawai'i's SNAP recipients \$1.66 million in discounts in 2021 alone.²⁴

FUNDING SUSTAINABILITY

Despite the overwhelming success and positive reception of DA BUX, it is a perennial challenge to fund the program and expand access to more retailers and SNAP users, largely due to the 100 percent matching

obligation required by the primary USDA funding source, known as the Gus Schumacher Nutrition Incentive Program (GusNIP).

Other states have been able to allocate state funding to support this match. In Hawai'i, the state legislature has only provided \$100,000 appropriation over two years to support the program, or less than 3 percent of the total program operating cost for fiscal year 2021.

Continued funding for the program requires that Hawai'i's nonprofit administering agency, The Food Basket, submit regular, lengthy applications for GusNIP funding.

CHALLENGES & OPPORTUNITIES

Figure 5. DA BUX Awareness by SNAP Recipients, Hawai'i (2022)²⁹

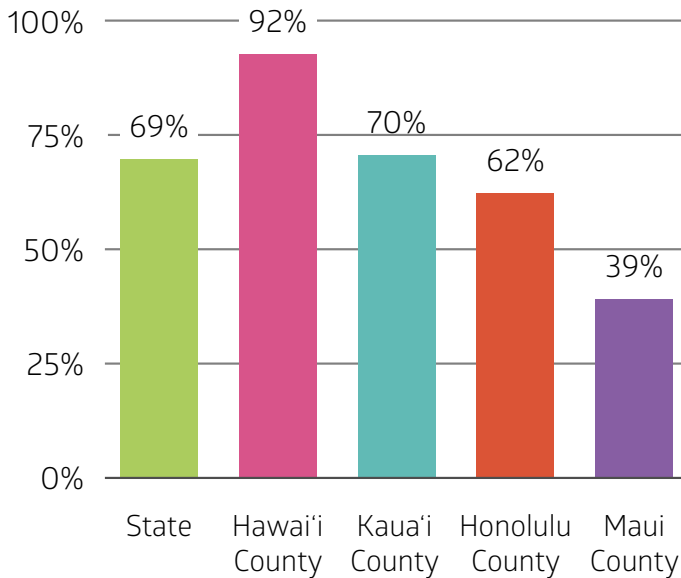


Figure 6. DA BUX Utilization by SNAP Recipients Aware of the Program, Hawai'i (2022)³⁰

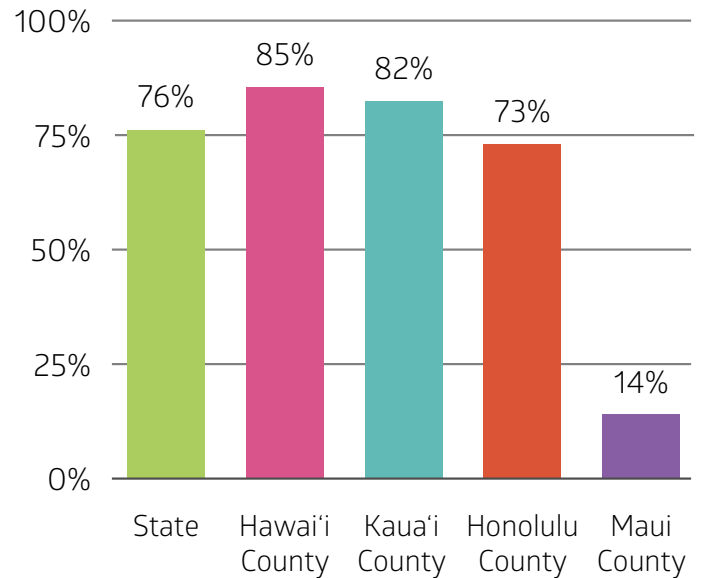


Figure 5 shows that, in Hawai'i, 69% of SNAP recipients statewide were aware of the DA BUX program in 2022. Compare that to **Figure 6**, which shows that, of those Hawai'i SNAP recipients who were aware of the DA BUX program in 2022, 76% made use of the program that year.

“The current competitive grant process is not sustainable for our growth, as it requires a plan for substantial program expansion or innovation each time we apply.” — DA BUX Coordinator²⁵

Long-term, sustained funding would allow for an increased yearly operating budget over a multi-year period to safely/equitably expand DA BUX to more grocery store locations (e.g. all Foodlands, Safeway etc). While most grocery stores in Hawai'i carry DA BUX eligible produce, the majority of grocery stores statewide do not participate in DA BUX.²⁶

AWARENESS AND ACCESS

Although the majority of SNAP recipients we interviewed are aware of the DA BUX program and

make an effort to use it whenever possible, a 2022 statewide DA BUX awareness assessment found wide disparities between the level of DA BUX awareness and utilization across each county.²⁷

A few recipients we interviewed said they had difficulty determining which items qualify for the DA BUX discount, while respondents to the 2022 DA BUX awareness assessment also expressed concern with a lack of in-store marketing and signage for eligible produce as well as DA BUX not being available at the grocery stores where they most frequently shop (e.g., Safeway, Foodland, etc.). This lack of in-store marketing and program availability at popular grocery store locations has resulted in low program awareness in a majority of counties and low utilization, especially in Maui County.²⁸

EXPAND PROGRAM ELIGIBILITY & PARTICIPATION



RECOMMENDATIONS

1. Advocate for higher SNAP eligibility thresholds at the federal level: Policymakers and advocates should ask the federal government to increase the net income requirements for SNAP recipients.
2. Support the Biden Administration's efforts to expand eligibility: Work with Hawai'i's congressional delegation to eliminate eligibility restrictions for college students and other underserved groups.
3. Pass state legislation to remove the partial restriction on individuals with felony drug convictions.
4. Expand eligibility to COFA citizens: Partner with advocates from other states with high Compact of Free Association (COFA) populations to identify pathways and push for expansion on the federal level.
5. Prepare for economic changes that would result in mass benefits cliffs: Providers and advocates should work closely with DHS and other agencies to identify looming changes—such as loss of federal aid, minimum wage increases, or a cost of living increase—that could lead to abrupt loss of benefits for large swaths of SNAP recipients.
6. Implement the Elderly Simplified Application Project (ESAP) to facilitate enrollment and reduce churn among Hawaii's senior population.
7. Maximize deductions: In order to ensure that all eligible households maximize their allotments, states, participants, advocates and case workers should be aware of key policies that allow deductions, in particular for medical and dependent care.
8. Replace the Thrifty Food Plan with the Low-Cost Food Plan: Advocates should support including this provision in the next Farm Bill, or supporting the Closing the Meal Gap Act of 2021, which already contains this provision.

“IN HAWAI‘I, THE REALITY IS THAT A FAMILY OF FOUR FOLLOWING THE THRIFTY FOOD PLAN WOULD SPEND \$1,794.60 PER MONTH ON FOOD—A FULL TWO-THIRDS OF THE NET INCOME LIMIT FOR A FAMILY OF FOUR IN HAWAI‘I.”

INCOME ELIGIBILITY

In order to qualify for SNAP, applicants must meet both gross and net income requirements that are based on the Federal Poverty Level (FPL). The original FPL calculations assumed that a household would spend one-third of its budget on food.

In Hawai‘i, the reality is that a family of four following the Thrifty Food Plan would spend \$1,794.60 per month on food³¹—a full two-thirds of the net income limit for a family of four in Hawai‘i.

Data from our assessment highlights that this is a major concern, with many of the recipients and providers we interviewed believing that the gross and net income limits for SNAP should be raised.

“He only makes \$17 an hour, full-time, 40 hours. I know for a fact there’s no way you can make “too much” living in Hawai‘i ... especially with four kids.”

“You pay \$1,800 in rent, \$300 in electric, \$400 in the phone bills ... and now you have four little kids running around, and you gotta feed them. Now she has to use cash ... I just felt really bad for her. Why can’t they make the qualifications a little bit lighter?”

BENEFIT CLIFFS

If an individual’s net income is even one dollar above

the limit, their SNAP benefits are canceled. This has resulted in a “benefit cliff” for the program, where people who earn above the income limit suddenly lose their eligibility.

Several recipients mentioned having to weigh getting a new job or pay raise against losing their SNAP benefits. One recipient described how she was enrolled in SNAP while she worked part-time, but lost her benefits when she switched to full-time work. She then successfully reapplied for SNAP once she returned to part-time work, although she has lingering concerns about her future eligibility for the program.

BROAD-BASED CATEGORICAL ELIGIBILITY

Federal SNAP rules limit applicants’ gross income—the total amount they earn before taxes and deductions—to 130 percent of the FPL.³² Hawai‘i is one of a handful of states that takes advantage of an option known as Broad-Based Categorical Eligibility (BBCE), which allows states to raise the gross income limit. Hawai‘i uses BBCE to raise its gross income limit to 200 percent of the FPL, the maximum allowable by federal law.

An applicant’s net income is then determined after deductions for child care, medical care, extra shelter costs, and other expenses are applied to their gross income. This amount cannot exceed 100 percent of the FPL, even with the BBCE provision.³³

Figure 7. Gross and Net Income Limits by Household Size, Hawai'i (2022)³⁴

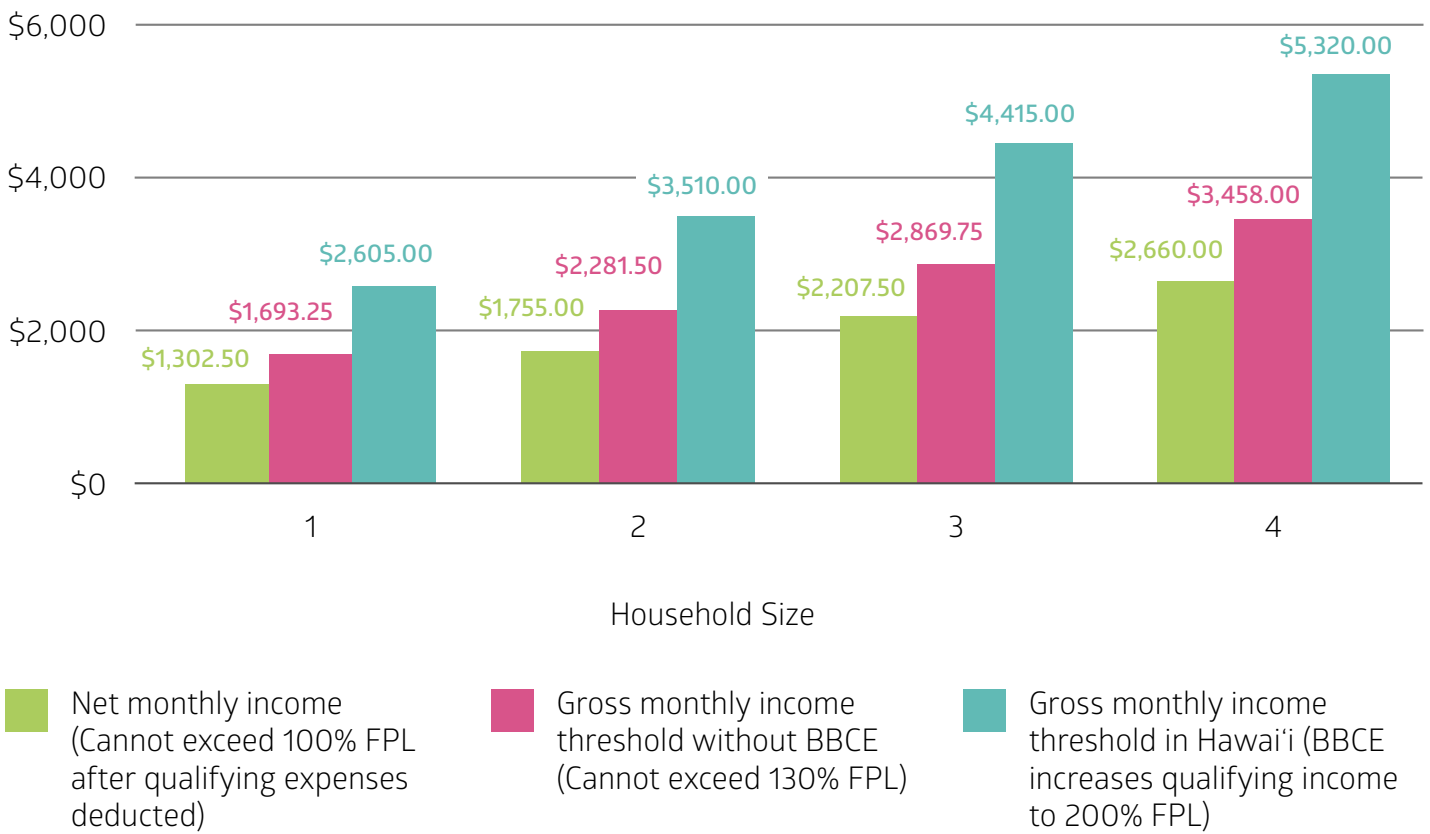


Figure 7. Broad-Based Categorical Eligibility increases the gross income limit from 130% to 200%, allowing more families to fall under the qualifying income for eligibility. This means that a family of four could qualify if they make less than \$5,320 per month.

KŪPUNA

Seniors and people with disabilities who are on fixed income can risk losing their SNAP benefits if their other government benefits are increased. For instance, a number of the seniors who participate in SNAP also receive supplemental security income (SSI), a federal benefit that is intended for individuals with low incomes and few assets.³⁵

In January of 2022, the SSI program had its largest cost of living increase in 40 years, rising from \$794 to \$841. If the household has other sources of income, this could push them over the income limits, disqualifying them from the program if they earn just \$1 above the cutoff.

INELIGIBLE POPULATIONS

“THESE INDIVIDUALS PAY TAXES JUST LIKE OTHER U.S. RESIDENTS, BUT THE WELFARE REFORM ACT OF 1996 REMOVED ACCESS TO SNAP AND OTHER PUBLIC BENEFITS PROGRAMS THROUGH A DEFINITION TECHNICALITY.”

Even though SNAP eligibility is primarily determined by income, there are a host of eligibility requirements that override income limits. Fortunately, Hawai‘i’s SNAP office is proactive at taking advantage of many waivers for eligibility.

However, there are still federal restrictions for many Hawai‘i residents, including non-citizens, people with felony drug convictions, and full time students (with some exceptions).

The Biden-Harris administration has recommended as part of the National Strategy on Hunger, Nutrition, and Health to work with Congress to lift these eligibility restrictions,³⁶ which make up a significant portion of Hawai‘i’s population.

COLLEGE STUDENTS

In 2020, there were around 89,206 college (including graduate and professional school) students living in Hawai‘i, and 67.9 percent of them would have theoretically been eligible for SNAP under the state’s gross income limit for a one-person household—amounting to a total estimated population of 60,542 individuals.³⁷ However, their status as a college student can still disqualify them unless they are also working at least 20 hours per week or have a dependent.

PEOPLE WITH FELONY DRUG CONVICTIONS

Federal law prohibits people with a felony drug conviction from being eligible for SNAP. However, states have the option to opt-out or modify this ban.³⁸ While nearly 30 states have opted to remove

the ban completely, Hawai‘i is one of 20 states that still institutes a “modified ban” that restricts SNAP participation for people with felony drug convictions.³⁹

This means that people with felony drug convictions must “comply with [drug] treatment” or have “not refused or failed to comply with [drug] treatment” to regain eligibility.⁴⁰ This additional restriction places some of Hawai‘i’s most vulnerable citizens at increased risk of losing access to a vital resource essential for self-sufficiency upon re-entry.

The 2021 United States Sentencing Commission Federal Sentencing Statistics Report found that 48 percent of all federal sentences in Hawai‘i were drug related, compared to 31 percent nationally.⁴¹

COFA CITIZENS AND NON-U.S. CITIZENS

Partially as reparations for the detrimental health and environmental impacts of more than a decade of nuclear weapons testing on their native land, and in exchange for military control over a large swath of the Pacific, the U.S. offers citizens of the Marshall Islands, Palau and the Federated States of Micronesia the opportunity to permanently live and work in the U.S. through an agreement known as the Compact of Free Association (COFA).^{42, 43}

Beginning in 1986, tens of thousands of COFA citizens moved to the U.S. in search of better economic opportunities for themselves and their families. In 2018, there were roughly 24,755 COFA residents living in Hawai‘i,⁴⁴ the highest of any state in the U.S. These individuals pay taxes just like other U.S. residents, but



the Welfare Reform Act of 1996 removed access to SNAP and other public benefits programs through a definition technicality.⁴⁵

U.S-born children of COFA citizens are eligible. However, income eligibility is determined by the adult guardians in the household, who are not eligible themselves. In other words, although according to SNAP income requirements, all the family members are deemed to be in need of SNAP assistance, only the

children in the household receive it. This means that COFA households receive less resources to make ends meet relative to other households.

One COFA citizen we spoke with shared that she felt her U.S. citizen children were unfairly disadvantaged because of her immigration status.

“Not having SNAP makes us have to work harder to survive.”

CHALLENGES & OPPORTUNITIES

ELDERLY SIMPLIFIED APPLICATION PROJECT

As we noted earlier in this report, seniors typically participate in SNAP at lower rates than other age groups. One way to make SNAP more accessible for this population, and also to reduce churn, is through the Elderly Simplified Application Project (ESAP).

ESAP is a collection of federal waivers that makes it easier to get seniors enrolled in SNAP. States use the ESAP waivers for three primary objectives. These include:

1. Extending the recertification period from one to three years;
2. Eliminating the need for an interview to re-certify SNAP benefits; and
3. Only requiring verification documents from the client if the information is questionable (gathering and submitting these documents is often one of the most burdensome parts of the SNAP application process).

While data is still emerging, there is anecdotal evidence that the ESAP, in combination with other modifications, significantly improves the customer service experience

Figure 8. Number of SNAP Case Denials for Seniors by Denial Reason, Hawai'i (May–Sept., 2022)

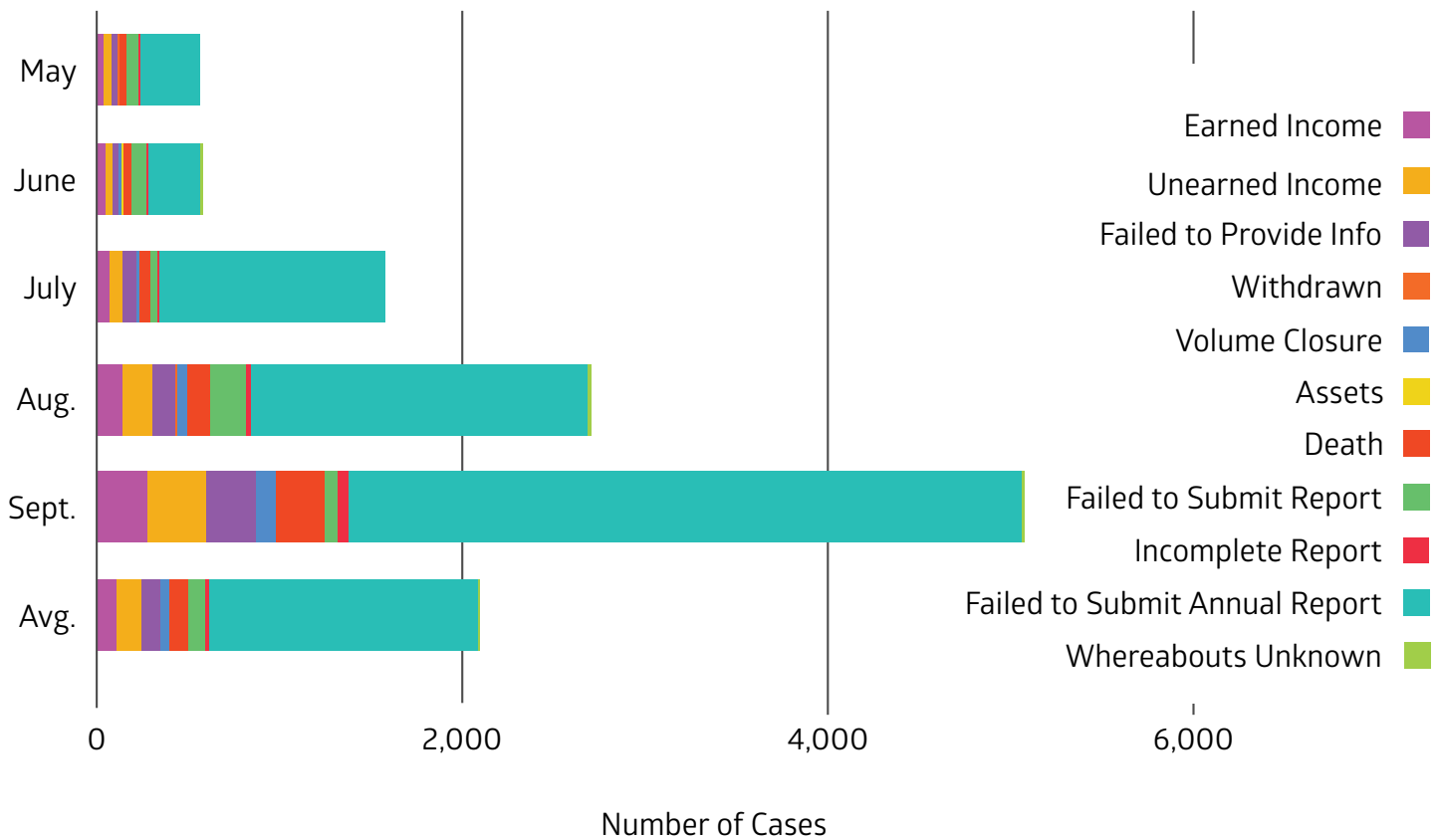


Figure 8. “Failed to Submit Annual Report” is the number one reason for churn, something that could be mitigated with longer certification periods.

and reduces administrative burden in early adopting states. A former analysis conducted by Hawai'i Appleseed found that the successful rollout of ESAP in Hawai'i could potentially add more than 6,500 seniors to the program.⁴⁶

In order to obtain approval from the USDA to pursue these objectives, the ESAP waiver requires that the state match data that has already been collected (i.e. income and social security number) with the applicant. DHS is working on an updated eligibility system (discussed later in this report) that would make this data match feasible so that Hawai'i can apply for the project.



MAXIMIZE MONTHLY ALLOTMENTS

Beyond adjusting the program's eligibility requirements, there are also opportunities to assist families in ensuring they receive the appropriate level of benefits (known as "monthly allotments") once enrolled.

DEDUCTIONS

As previously stated, Hawai'i allows those with gross incomes up to 200 percent of the FPL to be considered eligible, as long as they can prove that their net income is less than 100 percent after deducting monthly costs. The final net income is used to determine the monthly allotment, which can be as little as \$43.00 or up to \$1,573.00 for a family of four.⁴⁷

Like other states, Hawai'i fares poorly in taking advantage of two key deductions that help households fully maximize their monthly allotments.

According to the most recent data available, only 5 percent of households with seniors or people with disabilities claimed the medical deduction.⁴⁸ And only 6 percent of single-adult households with children claimed the dependent care deduction.⁴⁹

EMERGENCY ALLOTMENTS

The COVID-19 pandemic resulted in a number of temporary flexibilities and expansion of the SNAP program. As long as Hawai'i continues to extend the public health emergency declaration, SNAP households will continue to receive emergency allotments (EAs), which allow all households to receive the maximum monthly allotment. However, these waivers are expected to end in early 2023.

"I'm very grateful for what I get, but I know it's [the emergency allotment] gonna end, and I don't want it to end."

THRIFTY FOOD PLAN

Every year, the USDA adjusts its Thrifty Food Plan (TFP), which is supposed to reflect the cost of providing nutritious meals for a family of four in the U.S. It then uses this plan to calculate the maximum allowable SNAP benefits for that year—with special rates for Alaska and Hawai'i.⁵⁰

CHALLENGES & OPPORTUNITIES

Figure 9. Maximum SNAP Benefit by Household Size, Hawai'i (FY 2023)⁵¹

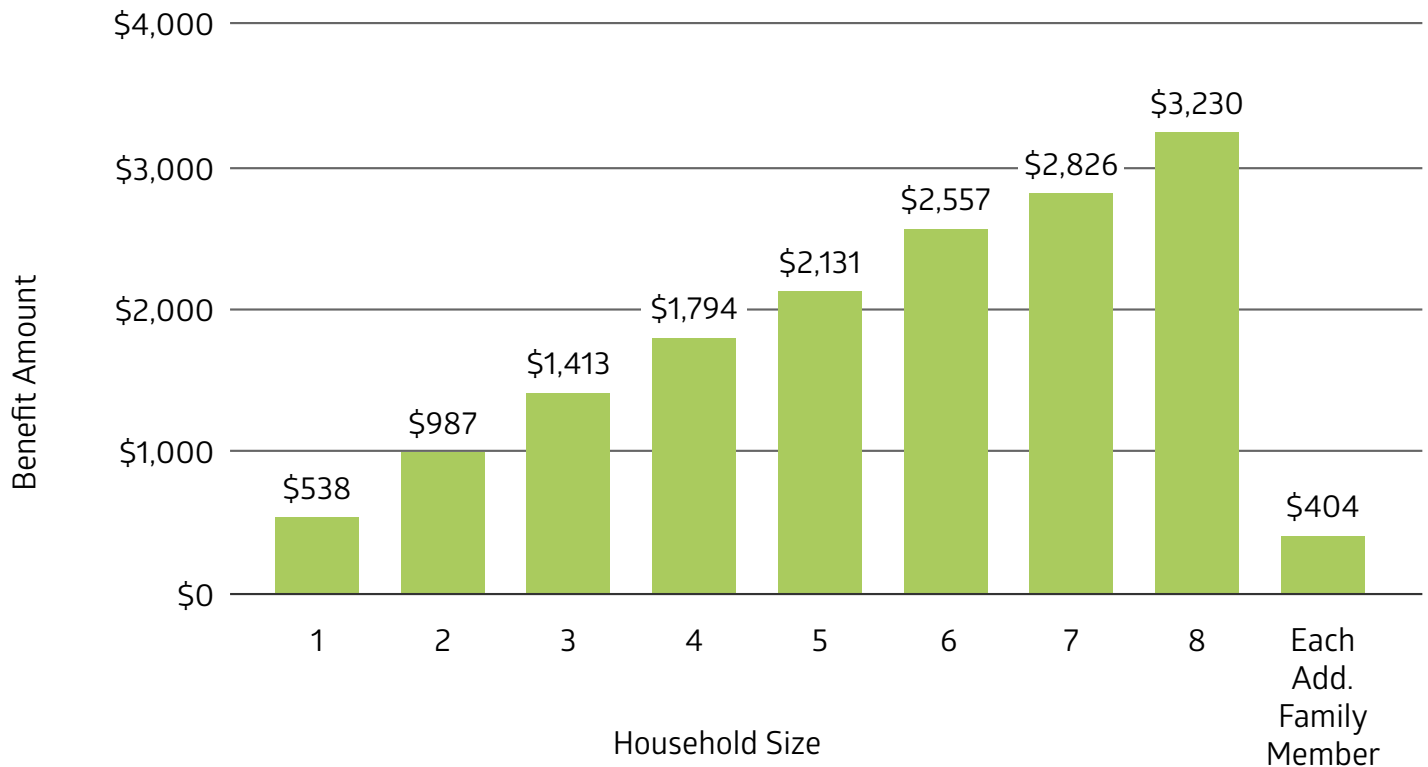


Figure 9. Not all households will qualify for the maximum allotment. However, taking advantage of deductions is an important step to ensuring households get the most they are qualified for.

Despite the special rate, nationally, the maximum allotments still fall short of the cost of affordably priced meals—an average of 10 percent in urban areas and 12 percent in rural areas.^{52, 53} And while it is true that SNAP is only intended to supplement a household's food budget, respondents we spoke with told us this is not usually the case.

“I would need to choose between the food and the bills, still. Only because with my income that I make...at the end of paying all the bills, I think I have like \$200 left. And that would either be for food or gas for the car.”

The [Food Research Action Center](#) (FRAC) has identified

a number of issues with the Thrifty Food Plan, which is the least expensive of the four food-cost plans under the USDA. These issues include unrealistic assumptions that the plan makes regarding food preparation, availability, and affordability.

The Closing the Meal Gap Act of 2021 sought to implement the USDA's Low-Cost Food Plan to replace the Thrifty Food Plan, and to expand deductions allowing more struggling households to participate.⁵⁴ As of the publication of this report, the USDA has not updated the basis of the Low Cost Food Plan amounts for Hawai'i since 2007.⁵⁵ However, based on the prior levels, it could result in approximately 30 percent increase in maximum monthly allotment over current levels.

IMPROVE EFFICIENCY & CAPACITY



RECOMMENDATIONS

1. Improve line staff retention by providing incentives and advancement opportunities: In the short term, this could include putting in place workforce optimization tools and opening up opportunities for telework. Longer term, work with unions to reclassify front line staff positions as “professionals.”
2. Expedite the Integrated Benefits Eligibility System rollout: The rollout should be paired with detailed staff training and technical assistance.
3. Continue investigating the possibility of connecting the SNAP and WIC eligibility systems.
4. Create a new business process engineering manager position at BESSD to oversee and update processing center operations. This position would work closely with the SNAP policy office and section administrators to gather suggestions from line staff, and ensure consistent implementation of program requirements
5. Allocate increased funding for contracted outreach providers, tied to expanding outreach to difficult-to-reach populations such as those in unstable housing.
6. Resume and expand DHS’ outreach efforts by adding a branch-level outreach manager position. This person would encourage more direct outreach events with eligibility workers across the state, so that individuals could get approved or re-certified on the spot.
7. Facilitate quarterly outreach convenings, with a structured agenda that allows sharing but also specifically identifies needs related to policy and protocol changes on the federal, state, and county levels.

DHS’ SNAP processing centers are at the core of the program. The personnel in these centers, known as line staff, are tasked with determining the final eligibility of SNAP applicants, enrolling them in the program, and periodically recertifying their benefits.

There is at least one processing center for every

county in Hawai’i (excluding Kalawao County), and there are multiple processing centers on the more populous islands.

“I love the clients, because you’re helping real people in need...and that’s why I stayed.” — SNAP Eligibility Worker

CHALLENGES & OPPORTUNITIES

Out of all of the areas covered in this report, processing center capacity and efficiency presents the most opportunities that are ripe for action at the state level.

Because this is such a large and multifaceted concern, this final section of the report is organized into four “interface points,” or junctions where

communication and collaboration could be improved between parties. These four junctions are:

1. Line staff and client;
2. DHS administration and line staff;
3. DHS and outreach providers; and
4. Provider to provider.

1. LINE STAFF TO CLIENT: IMPROVE CUSTOMER SERVICE & REDUCE BACKLOGS

The SNAP eligibility workers we interviewed openly acknowledged a persistent backlog of cases, and the impossible workload they are burdened with. While in recent years, Hawaii has been able to achieve high rates of timeliness on application processing, in 2021 timeliness dipped, a sign that application outweighed worker capacity.

“A lot of workers ...say too, how hard it is, how burnt out [they are].” — Eligibility Worker

“The volume of what needs to be done—compared to the amount of people and the resources that we have to do it—is very outweighed.” — Eligibility Worker

STAFF RETENTION

One theme that arose was that DHS’ lack of capacity is directly related to the hiring and retention issues at its processing centers. Several people mentioned frequent staff turnover and vacant positions.

Eligibility worker salaries start at \$38,004 and can go as high as \$80,088.⁵⁶ We did not ask staff to disclose where in the range they fell, but some workers believed that their wages were too low to compensate for the cost of living in Hawai‘i.

“Technically, [the line staff] have better benefits and wages working at the hotels.” — Eligibility Worker

“What’s gonna stop me from getting a job at Macy’s full-time? It’s gonna be less stress than what I’m doing now.” — Eligibility Worker

CALL CENTER

Each processing center has its own phone number that is staffed by rotations of eligibility workers. However, since processing centers have been unable to keep up with the sheer volume of calls they receive, DHS has also contracted a local IT firm to operate a call center. Even with this added capacity, a common complaint among SNAP recipients and service providers is that it is difficult to reach DHS personnel over the phone.

“I don’t leave a message, I just call a hundred times in a row if I have to before somebody answers. I want to get my answer right then and there.” — SNAP Recipient

TECHNOLOGY & ONLINE SELF-SERVICE PORTAL

In 2020, pandemic-induced office closures prompted DHS to introduce an online application that many interviewees welcomed, although some minor problems were reported. In particular, some elderly SNAP recipients do not have access to the Internet, either due to the cost or the remoteness of their location.

“I don’t have Internet. Do you think everyone’s got that?” — Elderly SNAP Recipient

Figure 10. Timeliness of SNAP Application Decisions by Year, Hawai'i (2011–2021)*, 57, 58

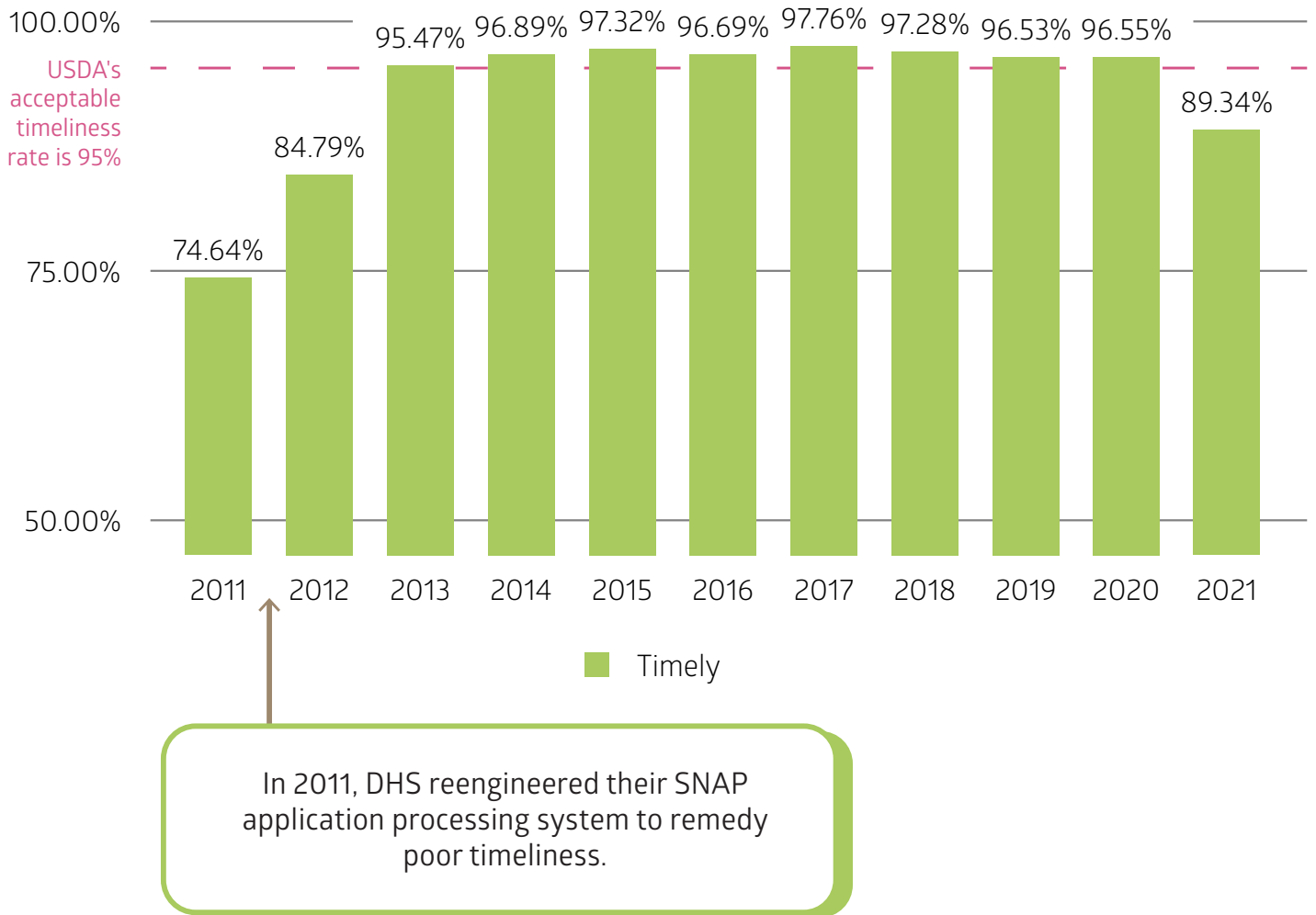


Figure 10. *Data for 2018, 2020, 2021 is incomplete.

DHS line staff also expressed frustration about the computer system they utilize for processing applications. In some cases, they are required to use up to four separate programs to access information on a single case. The main program for entering information about cases, known as JAVI, has not been updated since the early 1980s.

DHS' leadership is aware of these issues and is currently working to modernize their application system. This online portal, known as the Benefits

Eligibility System, would consolidate the multiple platforms currently being used into a single interface, allowing clients to apply for and manage multiple benefits, including SNAP, TANF and MedQUEST. Most importantly, it would allow clients to take on many basic account management tasks themselves, such as upload documents, submit reporting forms, check account balances, and make changes to their account.

Unfortunately, because the WIC program is administered by a different agency (the Hawai'i State

CHALLENGES & OPPORTUNITIES

Department of Health), this new system will not be able to incorporate WIC enrollment, even though the requirements are fairly similar for women who are pregnant or have young children.

A pilot project is underway as of the writing of this report to determine whether another mechanism for dual enrollment can be implemented for WIC and SNAP.

2. ADMINISTRATION TO LINE STAFF: STANDARDIZE OPERATIONS STATEWIDE

Our interviews revealed a significant lack of standardization and consistency in application and recertification processes between processing centers. A veteran eligibility worker stated that she frequently notices mistakes made by workers in other processing centers, concluding that many of them need to be retrained.

Another eligibility worker described the challenges of state-wide standardization due to what they called a culture of “small town mentality and focus” within her processing center.

“Like any small town, people do things the way they do them. And it’s their habit, and it’s entrenched. And outsiders that come in and try to ruffle everything up, they don’t go over so well.”

Eligibility workers brought up problems ranging from incorrect updates to an application’s status to miscommunication with clients. One eligibility worker told us that she often receives clients in-person who had been refused by another center on the island:

“They actually have printed out a map to our place and given it to clients.”

3. ADMINISTRATION TO OUTREACH CONTRACTORS: EXPAND OUTREACH CAPACITY

DHS currently contracts with eight organizations statewide to provide pre-screenings and application assistance for Hawai’i residents. These SNAP outreach providers are responsible for contacting potential SNAP applicants, assessing their potential eligibility for the program, and helping them complete the application. In many cases, outreach providers will also help their clients with problems that arise during the recertification process.

“We’re at hospitals, we’re at family centers, we’re at neighborhood centers. We’ve got our information all over the place.” — SNAP Outreach Provider

The majority of these organizations told us that their resources were stretched thin, and some of them believed they were taking on work that should be the responsibility of processing centers. One outreach

worker spoke about the increased workload that came with the pandemic.

“We’ve been in reactive mode because DHS was closed to the public for two years. We were sort of just picking up the slack that they left with their offices being closed.”

“[We] could always use more funding. We could be doing so much more. Really being proactive and targeting [groups like] veterans and students.”

Service providers reported that much of their job involves attempting to liaise between clients and processing centers, although many admitted that they don’t have a reliable contact to reach out to. The eligibility workers we interviewed confirmed that outside of referrals, they had limited contact with service providers.



“When we would try to connect them with a processing center, we could either not get through [to] them, we couldn’t leave a message... Eventually, we were able to communicate with someone, but it just took a lot longer than expected.” — SNAP Outreach Provider

Before the COVID-19 pandemic, processing center staff would occasionally hold their own community

outreach events, and DHS states that they plan to resume this kind of outreach in the near future.

A few of the providers we spoke with reported that having a direct line of communication with the branch manager responsible for oversight of their contract used to be an effective strategy for tracking down sticky cases. However, staff turnover has made this strategy inconsistent.

ISSUES FOR KŪPUNA

More involved outreach methods are necessary to reach older individuals. As one service provider said, “You know what kind of relationship you gotta make with kūpuna. I mean, they wanna

know who you are, they gotta trust you first.” At least three of the service providers we talked to make a special effort to hold SNAP outreach events at affordable housing projects for seniors.

4. PROVIDER TO PROVIDER: RELATIONSHIP BUILDING AND INFORMATION SHARING

Outside of client referrals, eight out of the 11 service providers we interviewed did not consistently communicate about SNAP with other provider organizations, whether contracted by DHS or operating independently.

One provider shared that there used to be quarterly meetings available to DHS-contracted outreach providers throughout the state, although those have since ceased.

The idea of some kind of intentional, facilitated communication between providers was met with some interest from all the providers we interviewed:

“It would be great if we could collaborate and maybe meet once a quarter or something. [We could talk about] our challenges, what works well, what doesn’t. Cause we’re the only ones who do this regularly.”

PROFILE

NAME: MARY

LOCATION: MAUI, HAWAI'I

Mary is a senior who recently enrolled in SNAP for the first time. “I was making \$13 an hour. Between what my boyfriend made and I made, we were doing okay. We weren’t rich, but we had enough to get by,” she remembered. However, after suffering a stroke, Mary could no longer work, and her boyfriend at the time decided to move out.

“Since he left, I said well, you know, ‘I gotta get a roommate’ because I can’t pay \$2,400 a month.” Even with a roommate, Mary could barely afford her living expenses. One day, she received an unexpected call from a SNAP outreach worker asking about her financial situation. “She said, ‘My goodness, how do you make it?’” Mary recalled.

With the help of this outreach worker, Mary successfully applied for her SNAP benefit, and she has been extremely grateful for the impact that it has had on her life. Although she has made strides in her recovery, Mary’s limited mobility is an impediment to everyday activities such as shopping and household chores, and she has to pay out-of-pocket for transportation costs. Since SNAP provides her with a stable means of paying for food, it has given her more breathing room to pay for other important bills. “I don’t know what I would do [without SNAP],” she admitted.

With that being said, Mary is troubled by her loss of independence. “I don’t like it. I never had to have help before.”



METHODOLOGY

The structure and methodology of this assessment were originally inspired by the Hawai'i Alliance for Community-Based Economic Development (HACBED)'s 2018 SNAP inquiry.⁵⁹

This report relies on qualitative data gathered from interviews with service providers, SNAP recipients, staff at processing centers, and DHS administrators.

In the interest of obtaining candid feedback, we chose to conceal the identities of the interviewees.

Furthermore, several interviewees only agreed to participate on the condition of anonymity.

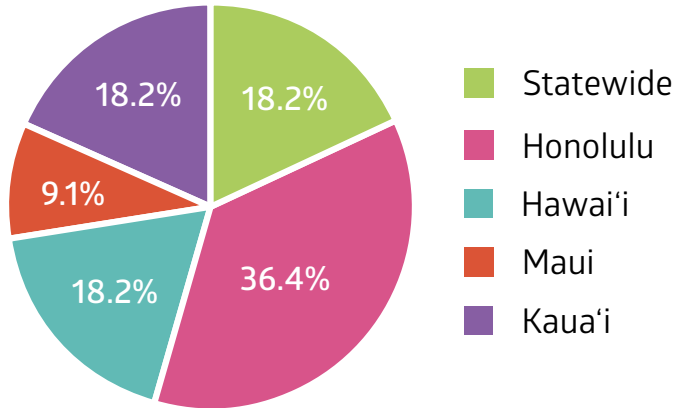
By engaging in discussions with service providers, recipients, and line staff, we were able to cross-reference the issues that were mentioned. This helped us to determine whether their issues were indicative of larger, systemic challenges rather than isolated instances. In addition, we asked them about the availability of SNAP eligibility and enrollment data and made recommendations for increased data transparency.

Interview Snapshot (*Contracted by DHS to provide SNAP Outreach services)

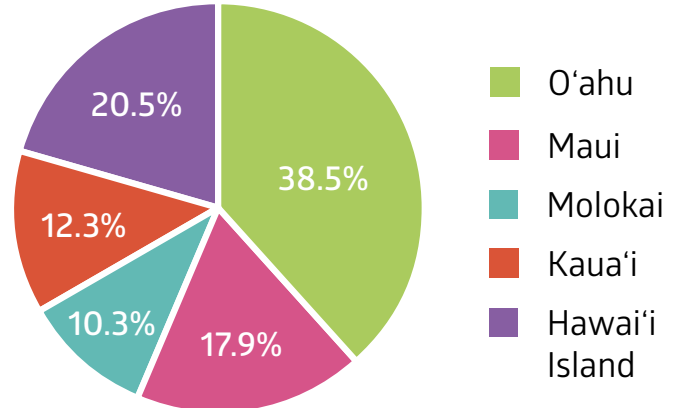
Organization	County
Kūpuna Collective	Statewide
Aloha United Way 211*	Statewide
Helping Hands Hawai'i*	City & County of Honolulu
Wai'anae Neighborhood Place*	City & County of Honolulu
Lanakila Pacific*	City & County of Honolulu
Catholic Charities	City & County of Honolulu
The Food Basket*	Hawai'i County
County of Hawai'i Food Access Coordinator	Hawai'i County
Project Vision*	Maui County
Child & Family Services*	Kaua'i County
Mālama Kaua'i	Kaua'i County

METHODOLOGY

SNAP Service Providers (11 Organizations)



SNAP Recipients (39 Individuals)



INTERVIEW PROCESS

We interviewed representatives of 11 service providers from across Hawaii'i, including seven of the eight that are currently contracted by DHS to provide SNAP outreach services (Hawaii'i Food Bank was added later and not interviewed for this project). In addition, we interviewed 39 current or recent recipients of SNAP in every county of Hawaii'i.

We attempted to interview a diverse mix of recipients, but we did not initially target specific groups, such as seniors or young adults. Once we realized that the age distribution of the interviewees was skewed towards older adults, we began making an intentional effort to

interview individuals who were under the age of 40.

We reached SNAP recipients through online surveys, community pantry events, and referrals by outreach providers. To encourage participation, we offered each interviewee a \$50 gift card to a grocery store of their choice.

We also interviewed 11 line staff from DHS over the phone. Ten of these interviewees were eligibility workers, and one of them was an office assistant. We did not report on which island these staff were located in order to protect anonymity.

LIMITATIONS

There were a number of practical considerations that affected the scope of this report. Due to limited capacity and funds, we were unable to conduct a large-scale assessment. Consequently, the feedback we received is not necessarily reflective of the entire program.

In addition, we acknowledge that the demographic composition of the interviewees may not be an accurate

representation of Hawaii'i's actual SNAP population.

Only a small minority of the interviewees were under the age of 40, even though this age group accounts for more than a quarter of the SNAP recipients in Hawaii'i. In terms of ethnicity, our report included the following key ethnic groups: Native Hawaiians, Pacific Islanders, Filipinos and Micronesians.

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9. Measured by the number of householders (formerly termed “head of household”). This chart does not necessarily represent the total number of individuals who are included in SNAP households.
10. The “Other Asian Alone” category is defined as: A person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent, including: Chinese, Korean, Vietnamese, Thai.
11. Note that, while single-race Native Hawaiians make up 6.3 percent of Hawai‘i’s households, Native Hawaiians of all race combinations (including those of mixed-race descent) account for 15.8 percent of the state’s population in terms of householders (heads of households).
12. The “Other Pacific Islander alone” category includes people with origins in Melanesia, Polynesia and Micronesia, including the Samoan, Guamanian or Chamorro, Fijian, Tongan and Marshallese peoples.
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