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Many SNAP Households Will Experience Long Gap Between Monthly Benefits Despite End of Shutdown

By Dorothy Rosenbaum

The Administration and states issued February Supplemental Nutrition Assistance Program (SNAP, or food stamp) benefits early¹ to avoid deep benefit cuts in that month that might otherwise have occurred as a result of the partial government shutdown. This change created a new problem that remains even though policymakers temporarily resolved the shutdown in time to provide full March SNAP benefits on time: a lengthy delay between February benefits (which most beneficiaries received by January 20) and March benefits. About 15 million households, which include about 30 million people, could experience a gap between monthly SNAP payments of more than 40 days. More than 4 million low-income households, including 8 million people, could experience a gap of *more than 50 days*.²

The much-longer-than-usual gap between benefit receipt for February and March will cause some households whose budgets already are extremely tight to face heightened difficulties affording food as they await their March benefits. In turn, this will place additional strain on the emergency food network and other community resources, which already are stretched.

Most Households Received February SNAP Benefits in January; March SNAP Benefits Are No Longer at Risk

The Department of Agriculture (USDA) worked with states during the shutdown to pay the vast majority of February SNAP benefits early, by January 20, to ensure that SNAP had the funding to stay open through February 2019 if the shutdown was not resolved. Despite the operational challenges of this approach, every state was able to issue benefits early,³ though with the temporary

¹ Dorothy Rosenbaum, “USDA to Fund SNAP for February 2019, But Millions Face Cuts if Shutdown Continues,” Center on Budget and Policy Priorities, updated January 10, 2019, <https://www.cbpp.org/research/food-assistance/usda-to-fund-snap-for-february-2019-but-millions-face-cuts-if-shutdown>.

² Based on CBPP analysis of state SNAP participation and issuance schedules. For these estimates, we assume 85 to 90 percent of SNAP’s February benefits were included in the early issuance, which all SNAP state agencies made no later than January 20. Since many states paid some or all of their SNAP issuance for February a few days before January 20, the figures in this paper could *underestimate* the number of days between issuances for many households.

³ “Interval between Issuances due to Early Issuance of February SNAP Benefits during Lapse in Appropriations,” USDA, February 1, 2019, <https://fns-prod.azureedge.net/sites/default/files/snap/SNAP-issuance-interval-policy.pdf>.

resolution of the shutdown on January 25, full SNAP benefits now are assured through at least the end of March. (See box.)

SNAP Has Sufficient Funding Through at Least March, and Likely April, Even if the Government Shuts Down Again on February 15

As a result of the continuing resolution (CR) that Congress and President Trump agreed to on January 25 to reopen the government for three weeks, SNAP benefits (and other SNAP functions) are now fully funded at least through the end of March, even if the government shuts down again on February 15.

That's because the new CR, like the prior CR that triggered the shutdown when it expired in December, provides funding for SNAP (and certain other programs) to continue payments for the month that begins within 30 days of the expiration of the CR.^a In the case of the December shutdown, that month was January. Under the new CR that expires in February, that month is March.^b

In addition, though the Administration has not confirmed that it would do so, it presumably could use the same authority it used to pay February SNAP benefits early in January to pay April benefits early — in this case, by March 17. In combination with SNAP's \$3 billion contingency reserve, that would likely ensure that SNAP could provide full benefits through April. Benefits for May and subsequent months, however, likely would be at risk if the government shuts down again in February.^c

a Section 110 of P.L.115-245, as amended by H.J. Res. 28.

b USDA confirmed in guidance on January 31 that SNAP benefits and state administrative costs are fully funded under the CR through March. That guidance did not mention SNAP funding for April in the event of another prolonged shutdown. See <https://fns-prod.azureedge.net/sites/default/files/snap/EarlyIssuance0A4january31.pdf>.

c Under some legal interpretations, SNAP may have a permanent appropriation under the Food and Nutrition Act, or there may be other funding available for SNAP. See <https://www.law.georgetown.edu/wp-content/uploads/2019/01/SNAP-Govt-Shutdown-Memo-Jan-2019.pdf>.

Many Households Will Have a Long SNAP Benefit Gap Even Though the Shutdown Has Ended

Even though SNAP now has funding to continue in March, the measures that the Administration and states took to protect SNAP in February have, for many households, created a much longer period of time between SNAP benefits than the usual 28- to 31-day cycle.⁴ That's because February benefits were issued at least ten days earlier than usual and most states stagger the issuance of SNAP benefits throughout much of the month, with some household regularly receiving their benefits in the latter part of the month.

Some states may be able to adjust their March issuance schedules to partly address this issue, but if all states paid February SNAP benefits on January 20 and don't change their March issuance schedules, we estimate that about 90 percent of SNAP households that receive ongoing SNAP benefits — about 15 million low-income households — will experience a more than 40-day gap

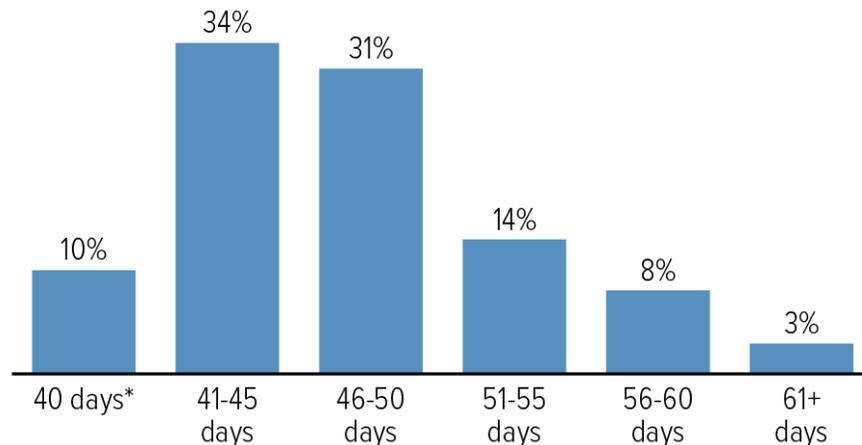
⁴ USDA's January 14, 2019 guidance made clear that if the shutdown were resolved, as now has occurred, USDA would not reverse the early February issuance. USDA's guidance on Food and Nutrition Service programs during the shutdown can be found at <https://www.fns.usda.gov/FY19Lapse>.

between issuances. Almost 60 percent will experience a gap of more than 45 days, and 25 percent will experience more than a 50-day gap (see Figure 1).⁵

FIGURE 1

Due to Shutdown, Most SNAP Households Face Lengthy Gap Between Benefits

Share of ongoing SNAP households, by number of days between February and March issuances



*This gap will occur in the seven states that issue all SNAP on the first day of the month and in other states that issue a portion on the first.

Notes: States issued February SNAP benefits in January to avoid benefit cuts that would have resulted from the partial government shutdown. The figures assume that states issued February SNAP benefits on January 20 and states do not change their March issuance schedules. The gaps between receiving benefits may be longer because many states issued their February SNAP benefits a few days before January 20. Gaps could be somewhat shorter if states make changes to their March issuance schedules. These figures do not include households whose eligibility had not been determined before January 20 and those that were due to be reassessed in January but the reassessment was not completed in time.

Source: CBPP analysis of state SNAP participation and issuance schedules from the Department of Agriculture

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States have long had the option to pay SNAP benefits to different SNAP households on different days of the month. Spreading payments across multiple days evens state workloads across the month and helps to ensure that retailers that participate in SNAP do not face a severe increase in demand for food and staffing on the day that SNAP benefits become available. Any given household, however, must receive its SNAP benefits on or about the same day of the month, usually resulting in only 28 to 31 days between SNAP issuance dates. Only seven states issue SNAP to all

⁵ Not all SNAP households receive ongoing benefits, so not all households' benefits were included in the January 20 early issuance. This is because, for example, some households had newly applied or will apply in the days and weeks after January 20, 2019, and others may have been due for a regular reassessment of their eligibility that was not completed in time to include their benefits in the early issuance. Based on SNAP application patterns and consultation with several state officials and other experts, we assume that about 85 to 90 percent of SNAP's February allotment was included in early issuance that occurred by January 20. We refer in this paper to households receiving the early issuance as "ongoing SNAP households."

households in the state on the first day of the month. Most others spread issuance out, often over ten or 20 days, and usually based on households' Social Security or case numbers or the first letter of the head of household's last name.⁶

SNAP law requires that “no household experience an interval between issuances of more than 40 days;”⁷ though on February 1, USDA issued guidance stating that this provision does not apply in this case. USDA notes, however, that no more than 40 days between SNAP issuances “is a reasonable benchmark,” and that it expects states to “develop plans to mitigate the impact and shorten the interval between February and March issuances,” taking into account “their system capacity, EBT [electronic benefit transfer] processor flexibility, and other administrative or policy constraints.”⁸ Under this guidance states will not be required to change their March issuance schedules, but they *could* change their March issuance to occur on or close to March 1, and stagger the adjustment back to households' normal issuance cycle over several months. This would spread the issuance gap over two or more months, but could prolong SNAP households' confusion about the uncertainty of SNAP benefits.⁹

Households in Almost All States Will See Gaps Longer Than 40 Days

The length of the gaps between February and March issuances will vary by state, but as Figure 1 shows, the vast majority will be longer than 40 days.

- **States where *all* households will have 40 days between SNAP issuances:** Seven states, accounting for about 2 percent of SNAP issuances nationally, issue SNAP benefits to all households on the first day of the month. In these states, the gap for ongoing SNAP households that received the early February issuance on January 20 would be exactly 40 days, as households would receive their March benefits on March 1.¹⁰ Those states are: Alaska, Guam, Nevada, North Dakota, Rhode Island, Vermont, and Virgin Islands.
- **States where households will have 40-49 days between SNAP issuances:** Another 21 states issue all (or almost all) of their ongoing SNAP benefits within the first ten days of the month. In these states, SNAP households will experience a 40- to 49-day gap in benefits. Those states are: California, Colorado, Connecticut, District of Columbia, Hawaii, Idaho, Illinois, Iowa, Kansas, Montana, Nebraska, New Hampshire, New Jersey, Oklahoma, Oregon, Pennsylvania, South Dakota, Virginia, Washington, West Virginia, and Wyoming.
- **States where some households will have 50 days or more between SNAP issuances:** About half the states have some households that will have more than 50 days between SNAP issuances if the states do not change their issuance schedules. (See Table 1 for a list

⁶ Each state's issuance schedule can be found at <https://fns-prod.azureedge.net/sites/default/files/snap/Monthly-Issuance-Schedule-All-States.pdf>.

⁷ Food and Nutrition Act of 2008, Section 7(g)(2)(A), 7 U.S.C. 2016(g)(2)(A).

⁸ “Interval between Issuances due to Early Issuance of February SNAP Benefits during Lapse in Appropriations.”

⁹ As mentioned, if the government shuts down again on February 15 and that shutdown also is not resolved quickly, it is possible that USDA would instruct states to issue April benefits by March 17, which would create another gap before May benefits.

¹⁰ The number of days would be exactly 40 if the state issued February benefits on January 20, the last day available for early issuance. Many states reportedly issued February benefits a few days earlier, which would result in a several-day longer period of time between issuances.

of the states.) In states that issue some SNAP benefits for ongoing SNAP households after the 10th day of the month, those households will have at least a 50-day gap; households that typically receive their benefits after the 15th day of the month will have a gap of 55 days or more. These households account for much of these states' ongoing SNAP benefits: *in 17 states, 50 percent or more of benefits will be issued with at least a 50-day gap.*

TABLE 1

SNAP Households in Some States Face a 50-Day or Longer Gap in Benefits as a Result of the Shutdown's Early February Issuance

State	Share of State's Ongoing SNAP Issued:		State's Share of Total SNAP Issued:	
	After 10th day (50+ day gap)	After 15th day (55+ day gap)	After 10th day (50+ day gap)	After 15th day (55+ day gap)
Alabama	65%	40%	4%	6%
Arizona	25%	0%	2%	0%
Arkansas	30%	0%	1%	0%
Delaware	65%	50%	1%	1%
Florida	65%	45%	18%	30%
Georgia	70%	40%	8%	11%
Indiana	70%	40%	3%	4%
Kentucky	50%	20%	2%	2%
Louisiana	40%	0%	3%	0%
Maine	80%	0%	1%	0%
Maryland	65%	40%	4%	6%
Massachusetts	30%	0%	2%	0%
Michigan	60%	30%	7%	8%
Minnesota	30%	0%	1%	0%
Mississippi	60%	35%	2%	3%
Missouri	55%	33%	3%	4%
New Mexico	50%	25%	2%	2%
New York	15%	0%	4%	0%
North Carolina	60%	30%	6%	7%
Ohio	50%	30%	6%	8%
South Carolina	50%	20%	3%	2%
Tennessee	50%	25%	4%	5%
Texas	40%	0%	11%	0%
Utah	67%	0%	1%	0%
Wisconsin	40%	0%	2%	0%
U.S. Total^a	25%	11%	100%	100%

Source: CBPP analysis of state SNAP participation and issuance schedules from the Department of Agriculture.

Note: These figures do not include households whose eligibility had not been determined before January 20 and those that were due to be reassessed in January but the reassessment was not completed in time.

Long Period Between SNAP Issuances Will Cause Hardship for Some SNAP Households

Now that SNAP has full funding to continue in March, SNAP households should have available the same total amount of SNAP benefits over the three-month period (January through March) that they otherwise would have. However, the change in the timing of February's issuance and the long interval between January 20 and a March SNAP issuance is likely to cause hardship for some households and, as a result, increase the demands for emergency food assistance and other community services.

It's well documented that SNAP benefits normally run out for most households before the end of the month. Within a week of receiving SNAP, households redeem over half of their SNAP allotments. By the end of the second week, SNAP households have redeemed over three-quarters of their benefits, and by the end of the third week they have redeemed 90 percent.¹¹

SNAP benefits are not intended to cover the entire month for most households. The SNAP benefit formula assumes that families will spend 30 percent of their available cash income for food. Many households spend their SNAP benefits quickly because they can only be spent on food. Cash income from other sources is needed to pay for other expenses, such as rent or mortgage, utilities, essential non-food items, clothing, gasoline, and car repairs. As a result, families use their SNAP benefits first to make food purchases, saving cash for other needed expenses.

Moreover, SNAP benefits are low. SNAP is intended to provide additional benefits to meet the cost of the Thrifty Food Plan (TFP), the Agriculture Department's estimate of a bare-bones, nutritionally adequate diet. But substantial research has found that the TFP, which currently provides at most \$1.85 per person per meal for a family of three (the *average* benefit is about \$1.40 per person per meal), is not sufficient to meet the needs of most low-income households.¹²

Because SNAP benefits often fall short of meeting basic monthly food needs, and because struggling households have to use available cash to meet non-food expenses, families can find themselves at the end of their 30-day SNAP benefit payment cycle without enough food or the resources available to buy more food. Research has found that food spending, food consumption, and diet quality fall and that food insecurity, hospital admissions, and school disciplinary problems rise after households have exhausted their monthly SNAP benefits.¹³ SNAP families often have to turn to social networks, food pantries, and others to get through the month.

¹¹ Department of Agriculture, "Benefit Redemption Patterns in the Supplemental Nutrition Assistance Program," February 2011.

¹² See, for example, Julie Caswell and Ann Yaktine, eds., *Supplemental Nutrition Assistance Program: Examining the Evidence to Define Benefit Adequacy*, Institute of Medicine and National Research Council, Washington D.C.: National Academies Press, 2013, <https://fns-prod.azureedge.net/sites/default/files/ops/IOMSNAPAllotments.pdf>.

¹³ Steven Carlson and Brynne Keith-Jennings, "The Adequacy of Supplemental Nutrition Assistance Program Benefits," Center on Budget and Policy Priorities, forthcoming.

Given the experience of the strain on low-income households' budgets and community resources under normal SNAP issuance patterns — when the gap between SNAP issuances is no more than 31 days — stretching that gap to 40 to 50 days or longer could create substantial hardship and hunger and sharply increase demand for local emergency food providers and other community social services providers.

Many SNAP households may find ways to weather this disruption. In general, households that participate in SNAP demonstrate a capacity to manage limited budgets. But extending the time between monthly benefit payments for the vast majority of SNAP households will certainly cause difficulty for some substantial number of poor families. Many families may not be able to budget the advance food-assistance benefit over an extended period of time for several reasons, including:

- **Lack of information.** USDA, state officials, retailers, and state and local nonprofit groups and charities are working to educate SNAP households about the early issuance of February benefits and the fact that those households will *not* receive another issuance in February. States are urging households to factor the early payment and the delay until a March payment into their February food budget. *But USDA did not require states to send SNAP households individual notices about the change in February benefits.* Instead, states are trying to use newspaper stories, posts on their websites, fliers in local welfare offices, and their partners' networks to spread the news about the changes in the timing of SNAP benefit delivery. Many households likely won't understand that the benefits they received around January 20 are an early issuance of their February benefit and that a lengthy gap will ensue before they receive their next benefit insurance.
- **Confusion and misinformation.** Reports are emerging that there is considerable confusion about why households are receiving early SNAP benefits for February and what to expect in the future, especially given the uncertainty that resulted from the government shutdown.¹⁴ The confusion may result in some SNAP households spending their SNAP benefits relatively quickly, exacerbating their food shortages in the latter part of February and the first part of March.
- **Household income fluctuations or unexpected expenses.** Households living with very low incomes experience shocks to their monthly income on a routine basis. Workers can see their hours and pay reduced with little warning. Individuals with monthly income below the poverty line rarely have savings to manage unexpected expenses. If their income drops or expenses spike unexpectedly during this timeframe, perhaps because of a high winter heating bill, households generally will use available cash to manage their non-food needs, leaving less money to buy food at the end of the SNAP payment cycle.
- **Differing abilities among SNAP participants.** Even with advance warning and robust information, some SNAP households can struggle to manage a significant shift in their budget, particularly those with cognitive limitations. Managing a major monthly budget shift

¹⁴ See, for example, Alfred Lubrano, "Because of Shutdown, February food stamps disbursed on Wednesday," *Philadelphia Inquirer*, January 16, 2019, <http://www.philly.com/news/food-stamps-hunger-federal-government-shutdown-20190116.html>; and Anna Gorman, "Pain From the Government Shutdown Spreads. This Time It's Food Stamps," *Kaiser Health News*, January 18, 2019, <https://khn.org/news/pain-from-the-government-shutdown-spreads-this-time-its-food-stamps/>.

like this could be difficult for some individuals with mental impairments who do not receive assistance to manage their benefits.

Conclusion

Although the government shutdown was resolved in late January, the disruption in the timing of February SNAP benefits is likely to make it hard for many SNAP households to meet their basic food needs as they wait for their March SNAP benefit payment. Some 30 million people in about 15 million households — the vast majority of SNAP households — will not get their March benefit until at least 40 days after they received their February payment. Of these, 8 million people in more than 4 million households will need to wait more than 50 days. This benefit disruption will likely cause hardship for a substantial number of these households. We expect more households to try to turn to emergency food networks and other social services for help as they seek to stretch their benefits across more days.