

FoodMap NY

Leveraging Private-Sector Innovation
and Investment for Food Security

FINAL PROJECT REPORT

Food & Nutrition Assistance

Electronic Benefit Transfer (EBT)
and Nutrition Incentive Integration
in New York State

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Center for
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Mother Cabrini
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Cornell
SC Johnson College of Business
CENTER FOR SUSTAINABLE GLOBAL ENTERPRISE

Electronic Benefit Transfer (EBT) and Nutrition Incentive Integration in New York State

Background & The Problem

The Supplemental Nutrition Assistance Program (SNAP) is the nation's largest food assistance program, providing nutritional support to a monthly average of 41 million Americans across 21 million households, including one out of every seven New York State (NYS) residents. Individuals and families enrolled in SNAP can access benefits through an Electronic Benefit Transfer (EBT) card, which they can use to purchase eligible food items at over 254,000 retailers across the country, including authorized retail stores, convenience stores, farm stands, and via online retailers.

Despite the potential benefits offered by SNAP, including reducing food insecurity and chronic disease risk, residents in NYS and across the country may experience a "SNAP gap," where SNAP benefits may not cover the full price of household shopping within a given month. Research conducted by the New York Health Foundation, for example, indicates that a significant number of state residents believe that SNAP benefits are "not enough," ranging from 40 percent of urban residents to 59 percent of rural residents. State residents may face additional barriers enrolling in and/or using nutrition assistance programs due to income requirements, paperwork requirements, and stigma associated with governmental assistance.

Nutrition incentives are programs designed to extend shopping dollar(s) beyond funding provided by the Supplemental Nutrition Assistance Program (SNAP) and serve as a way to assist primarily low-income shoppers in

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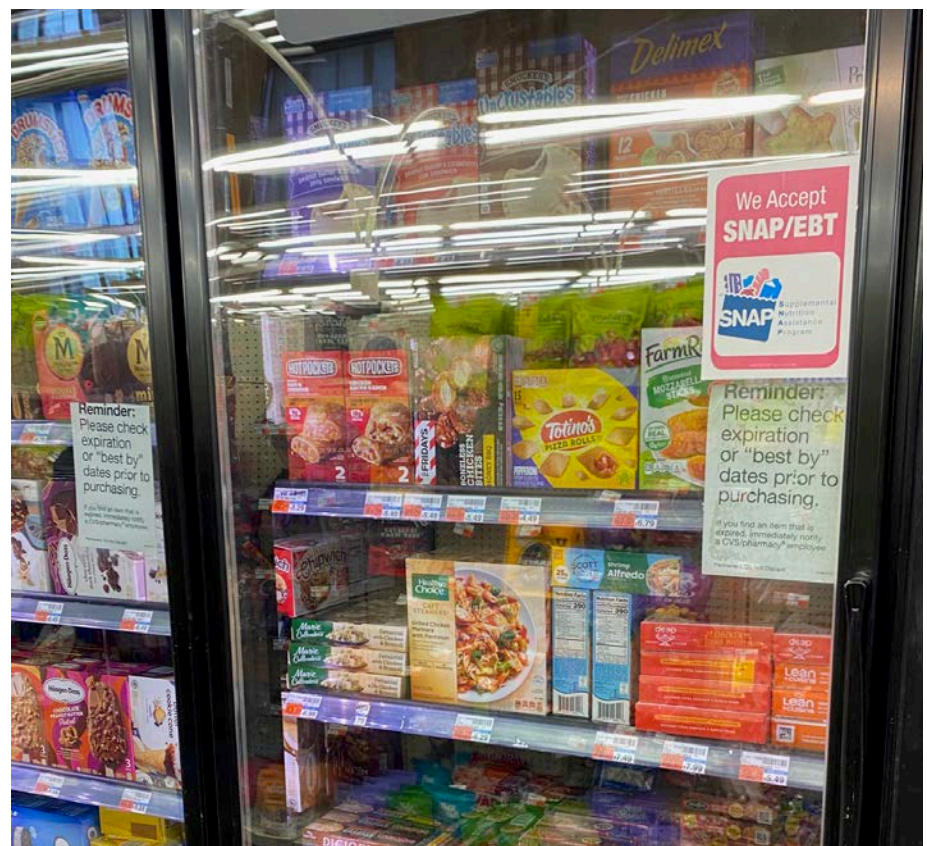


Photo taken by Marianna Koval



purchasing fruits and vegetables. The most common type of nutrition incentive program currently operating in the United States (U.S.) is SNAP incentives, which allow individuals enrolled in SNAP to receive additional money to purchase fruits and vegetables at a variety of retail locations, including grocery stores, farmers' markets, and farm stands. However, produce prescriptions, or programs provided by healthcare providers to increase consumption of fruits and vegetables to mitigate acute and chronic health conditions, are also considered a type of nutrition incentive.

SNAP incentives were first introduced in the U.S. in 2014 as the Congressional-approved Food Insecurity and Nutrition Incentive Program (FINI). Initial SNAP incentive projects funded through this program primarily operated in two ways. According to the National Grocers' Association, in some SNAP incentive projects, SNAP customers were eligible to receive discounts at the point of sale (POS) for qualified items, such as fruits and vegetables. In other projects, SNAP consumers received a form of coupon (e.g. paper coupon, token, voucher) after purchasing eligible items, which they could then redeem at a future time.

Following initial results indicating positive impact of FINI projects, the United States (U.S.) Congress expanded pilot nutrition incentive projects across the country. Over the four year span (2014-2018) across which FINI operated, a total of 114 grants, totaling \$90.3 million, were awarded to government and non-profit organizations in 42 states. FINI continued, and continues, to operate as the Gus Schumacher Nutrition Incentive Program (GusNIP), following the passage of the 2018 Farm Bill,¹ which "allow[ed] the Secretary [of Agriculture] to provide funding opportunities to conduct and evaluate projects providing incentives to income-eligible consumers to increase the purchase of fruits and vegetables." Since the GusNIP program was established in 2019, over \$270 million has been provided to 197 projects across the U.S.

Benefits of Nutrition Incentive Programs

Massachusetts' Healthy Incentives Pilot (HIP), the earliest nutrition incentive program launched in the U.S., demonstrated positive benefits of nutrition incentive programs. In HIP's final report (2014), the United States Department of Agriculture reported that consumers increased their consumption of fruits and vegetables by about ¼ cup daily, alongside an 11 percent increase in fruit and vegetables purchases. In 2021, researchers from Colorado State University released a report detailing additional benefits of nutrition incentive programs across the country. The authors estimate that, nationwide, every \$1 invested in a nutrition incentive program generates approximately \$3 of economic activity, including for job creation and labor income for workers. Further, while nutrition incentive programs operate across most, if not all, states, if nutrition incentive programs were to be expanded in all major food retail sites (e.g. grocery stores, corner stores, and farmers' markets) across the country, it is expected that: up to \$1.4 billion could be provided to families to purchase additional fruits and vegetables; over \$1 billion may be available in labor income for domestic workers; and between \$1.6 and \$3.2 billion would be provided to the national economy.

Current benefits have also been reported in New York State (NYS). Though only conducted on Field and Fork Network's Double Up Food Bucks program, the authors reported that in 2018 alone, the nutrition incentive program contributed \$357,000 to the state economy and \$82,000 in labor income, representing an output multiplier of 2.5. In other words, for every one dollar spent in nutrition incentives in NYS, \$2.50 is provided to the state economy. If this state program were expanded statewide, even at low market penetration (i.e., 60% of eligible grocery stores, 10% of eligible corner stores, and 80% of eligible farmers' markets) the program is estimated to contribute 521 jobs, including almost 500 jobs to retail stores, and a total of \$68 million to the state economy. In a high market penetration scenario (i.e., 90% of eligible grocery stores, 25% of eligible corner stores, and 100% of eligible farmers' markets), this impact is estimated to approximately double. It is important to note that other nutrition incentive programs aside from Double Up Food Bucks do operate across NYS; their reach and impact is detailed in 'Current Nutrition Incentive Landscape in New York State', below.

Beyond benefits brought to retailers through job creation, nutrition incentive programs have been shown to increase store sales.² Fruits and vegetables have higher profit margins than other snack foods (e.g. candy, chips, and sugary beverages), and nutrition incentives may assist business owners in generating additional revenue from produce while reducing food waste and spoilage.³ Moreover, business owners have new opportunities for market development and customer acquisition, highlighting⁴ the immediate and long-term benefits of nutrition incentive programs across a variety of food retail sites.



Marketing and consumer benefits have been widely reported at farmers' markets, including those in New York State. For example, in a 2019 survey of farmers' market managers, Field & Fork Network, which operates the nutrition incentive program Double Up Food Bucks, reported that 93 percent of participants reported an increase in market traffic and 86 percent saw an increase in new customers. All of the individuals that responded (100 percent) stated that they would want to participate in the Double Up Food Bucks program the following year. Similar results have been reported from Michigan's Double Up Food Bucks program. For example, approximately one-third of survey respondents (farmers) stated that they had grown new types of produce as a result of participation in Double Up Food Bucks, and three-quarters of vendors "agreed that they had both more customers and more repeat customers as a result of participating in Double Up. The majority also agreed that their farms had higher gross sales and were more profitable."



Challenges of Nutrition Incentive Programs

Despite the numerous benefits of nutrition incentive programs, challenges do exist for vendors, managers, and retailers, including in technological and resource capacities, administrative costs, and user stigma.

Smaller retailers, such as corner stores, may face challenges with in-store capacity, limiting their ability to accept nutrition incentives and qualifying items. In a 2022 report prepared by The Food Trust in collaboration with the Gus Schumacher Nutrition Incentive Program-supported Training, Technical Assistance, Evaluation, and Information Center, the authors state that while small retailers like corner stores are "ripe" for nutrition incentive projects, one of the greatest challenges smaller retailers face is with point-of-sale (POS) systems. For many smaller stores,

POS technology is limited, with most stores operating with lockbox technology rather than the POS systems available at larger, chain supermarkets that may be able automatically identify eligible items and provide customers with a coupon or voucher at the end of their purchase. The National Grocers' Association (NGA) states that "this issue has actually prevented many retailers from even pursuing GusNIP projects since it becomes so technically difficult to set up a program at the register."⁵

Given what the NGA refers to as an "immense need for a national POS solution for GusNIP [to] allow the program to become scalable nationwide much more successfully and get healthy foods into consumers' hands," the Association, alongside the Food Industry Association, issued an open letter in 2021 to food retailers, wholesalers, and other organizations asking them to join in an initiative to work with POS system developers to creating innovative solutions for retail partners. In response, NGA released a document in 2023 detailing guidance to select retail technology and electronic systems (i.e., point-of-sale systems) to allow for retailer nutrition incentive systems, such as for produce prescription or food-as-medicine programs, though retailer barriers continue to persist.⁶

Next, administrators may experience challenges implementing numerous nutrition incentive programs. Within New York State, there are almost ten nutrition incentive programs currently (or recently) operating, including programs funded by GusNIP funds (Double Up Food Bucks) and programs funded by the NYS government (Fresh Connect). Moreover, nutrition incentive programs may be state-wide (Double Up Food Bucks), county- (Clinton County Farm Fresh Cash), or city-specific (NYC Health Bucks), some of which are detailed below:

Double Up Food Bucks (Field and Fork Network): this program provides 1:1 match of SNAP dollars via tokens, coupons, or card for fruits and vegetables. Since the program was launched in 2014, Double Up Food Bucks has reached over 100,000 customers who have purchased 6.4 million pounds of food. Altogether, food purchase through the program has totalled upwards of \$10 million. The program has also partnered with 550 farmers across the state. Currently, Double Up Food Bucks operates in over 230 sites, including farmers' markets, mobile markets, and retail stores. Field and Fork Network, the organization that operates the program, expects to expand Double Up Food Bucks to all counties in the state (excluding NYC) by 2027. Although the program was initially funded by GusNIP funds, Double Up currently receives foundation funding and, since 2022, a \$2 million state budget appropriation backed by bipartisan support.

FreshConnect (NYS Department of Agriculture and Markets; NYS Department of Veterans' Services): this program provides 1:1 match of SNAP dollars via FreshConnect check for SNAP-eligible items. The program currently operates 52 sites across the state, including farmers' markets and farm stands. FreshConnect has expanded significantly in recent years, with a 156 percent increase in farmers' market coupon capacity from 293,800 in 2022 to 750,000 coupons in 2023. Recent funding estimates are, however, unavailable. NYS Department of Agriculture and Markets started a digital pilot program for this nutrition incentive in the fall of 2023, but it may not be able to be integrated into EBT given that the program encompasses non-fruit and vegetable items. More recently, NYS Governor Kathy Hochul vetoed expanding the program to retail stores.⁷

Health Bucks (New York City Department of Health and Mental Hygiene): this program provides a \$2 for \$2 match, up to \$10 per day, of SNAP dollars via coupons for fruits and vegetables. Over 1.3 million Health Bucks worth over \$2.6 million were distributed in 2022, including more than \$1.7 million in Health



Bucks distributed through the farmers market SNAP incentive. Currently, the program operates at over 130 sites in New York City, including farmers' markets and farm stands. The program is currently funded via a \$5.5 million GusNIP grant funding plus matching city funding.

Previous research indicates that streamlining existing programs could save millions in administrative costs each year.

Lastly, while nutrition incentives have been shown to provide benefits to consumers, including increased purchasing power and fruit and vegetable consumption, consumers may also experience challenges using nutrition incentives. Previous research has indicated that consumers shopping with nutrition incentives, especially if enrolled in multiple programs, may experience difficulties organizing and using multiple payment methods (e.g. card, coupon, tokens; different redemption limits), particularly if specific stores only take certain incentives or only allow for SNAP. Relatedly, users who wish to apply nutrition incentives are often required to ask the staff of grocery stores or farmers markets for vouchers to get started, which may add to the existing stigma of using food assistance programs, particularly with visible, non-digital payment methods such as tokens or coupons.



The Proposed Solution: EBT and Nutrition Incentive Integration

How It Works

The growth of nutrition incentive programs across NYS has led stakeholders to call for an integrated digital point-of-use payment method to improve user experience and reduce barriers to uptake. This would allow the match amount to return to the card instead of being redeemed through coupons, tokens, loyalty cards, or other methods. In other words, when an individual uses their EBT card to purchase nutrition incentive-eligible items, they receive the extra dollar amount directly back on their EBT card rather than receiving an alternative payment method (e.g. coupon, token) for later use.

Integrating nutrition incentive programs onto EBT cards would require cooperation amongst numerous stakeholders, many of whom are listed below and are experts in implementing this project, though technical assistance is available through Fair Food Network and the National Grocers' Association. Given the limited number of states currently operating an integrated nutrition incentive program, instruction is currently limited. However, achieving nutrition incentive integration would require:

1. Amending, if needed, the contractual agreement between the payment processor and state agency charged with disbursing food assistance
2. Changing technical requirements and updating software to allow point-of-sale systems, EBT cards, and processing systems to recognize eligible food items and allow for seamless benefit distribution to consumers
3. Selecting a nutrition incentive program and program administrator for integration, including deciding upon and codifying what food items will be eligible under the program, the matching percentage, and dollar cap per day, week, or month (if any)
4. Selecting a retailer(s) and/or geographic location(s) to pilot integration
5. Launching the integration, including through consumer advertising and education

Why Nutrition Incentive Integration?

During the landscape analysis phase of this project, the FoodMap NY team spoke to state agency staff in states currently operating nutrition incentive programs (e.g. Washington) or are planning to launch nutrition incentive programs in the near future (e.g. Iowa), both of whom spoke to the benefits of nutrition incentive integration. The Washington State Department of Health, for example, estimates that their nutrition incentive integration program will save millions in administrative costs each year. Similarly, the Iowa Healthiest State Initiative found innovative ways to tackle integration, including through continued relationship development with larger retailers, specifically at the administrative level. By doing so, the organization was – and will continue to be – able to put the responsibility on the grocery store to update its register system if necessary, provide training, and implement the program across all of its locations, making the program both efficient and scalable. In discussions with stakeholders from New York State,

members of numerous state agencies also called for an integrated digital point-of-use payment method, particularly given the wide variety of programs currently operating across the state.

Altogether, the research conducted through the landscape analysis portion of this project, including stakeholder interviews and literature review(s), indicated that integrating nutrition incentives onto the EBT card may have numerous benefits, including:

1. Reducing barriers to nutrition incentive uptake by decreasing user stigma and need to keep track of multiple payment methods;
2. Helping food retailers' bottom lines through reductions in produce spoilage and need to distribute coupons or tokens;
3. Assisting in administrative cost savings by streamlining programs.

Success Stories: Integration in Other States

Nutrition incentives have successfully been integrated onto EBT cards in states including Massachusetts, California, Washington, and Rhode Island, with expected integration in Colorado, Louisiana, and Iowa. Although evaluation into the efficacy of nutrition incentive integration programs is ongoing, the below examples provide an overview of what a potential nutrition incentive integration program may look like in New York State:

Massachusetts: In 2012, a pilot project was started in one county at a variety of different retailers (grocery stores, convenience stores, farmers markets) that provided a 30 percent match on fruits and vegetables that were purchased; this funding was provided immediately on the consumers' EBT cards. In 2017, the scope was narrowed to five different local farm vendor types (direct marketing farmers, farmers markets, mobile markets, others) that provided a one-to-one match and a monthly cap for households (\$40, 60, or 80 depending on household size). The total costs for implementing the program, including the \$263,043 in incentives earned by HIP participants, were \$4.4 million. This included the launch of the nutrition incentive program, as the state did not have an operating program at the time. The largest share of costs (55%) were incurred for system design, development, and testing for EBT and retailer systems changes. Although the program began with federal FINI funding, this was exhausted quickly, and the program is now funded through the state budget.

Rhode Island: Here, nutrition incentive integration started with a six-month planning process with stakeholders, including the RI State Food Association who stated that they will not take tokens or coupons; there was no choice but to consider anything but EBT integration. The integration program was operationalized in six to eight months to test with FIS. The program currently operates as a 50% match on eligible items (with a \$25 cap) in grocery stores only. The total costs for implementing the program were \$1.5 million for operations as part of \$11.5 million state assembly budget appropriation, which includes other programming not related to the nutrition incentive program.

Washington: Since 2017, stakeholders in Washington began talking about nutrition incentive integration as a scalability tactic and likely way to reduce administrative costs in the long-term for administrators and for the participating retailers. Nutrition

incentive integration was also identified as an easier payment method for SNAP shoppers to use. The integration was piloted with vendors at the Pasco Farmers' Market in South Central WA and three grocery stores of various sizes, including a co-op and one large supermarket chain, where shoppers can spend a dollar of SNAP funds on fruits and vegetables and get a dollar back on future SNAP-eligible items. The pilot planning stage lasted two years; WA launched with farm vendors first and then will launch with grocery retailers. The pilot initially received \$2 million dollars in the state budget (SHB 1784), though the program more recently received additional USDA Electronic Health Incentive project (eHIP) funding.⁸

Colorado, Louisiana, and Iowa are also expected to launch their respective nutrition incentive integration programs via eHIP funding.



Current and Potential Partners

Building off of the findings of the landscape analysis, the FoodMap NY team successfully convened a working group with numerous state agencies, many of whom would be directly involved with implementing the program, including the following representatives:

- **Susan Zimet**, NYS Food and Anti-Hunger Policy Coordinator, Office of Temporary and Disability Assistance
- **Alex Amal El Din**, Empire Fellow with Department of Agriculture and Markets, Department of Health, and General Services
- **Elida Esposito**, SNAP PROT at the Office of Temporary and Disability Assistance
- **Luke Posniewski**, EBT Bureau Chief
- **Wendy DeMarco**, Director of Food and Nutrition Policy at the Office of Temporary and Disability Assistance

Updates were provided to the working group monthly at minimum, either via Zoom call or email. Moving forward, it may be beneficial for the working group to have representation of retailers, farmers, and/or farmers' market staff members, similar to the governance structure in states such as Washington. This will be particularly important depending on the site(s) that will allow for integration. Regardless, the working group provided critical information on the technical aspects of nutrition incentive integration alongside political and economic feasibility.

The FoodMap NY team also spoke to individuals and/or organizations in states that have implemented nutrition incentive integration programs to some degree, including Massachusetts, Rhode Island, and Washington, alongside states that are planning to launch integration soon, such as Iowa. Technical assistance has also been provided by organizations such as National Grocers' Association and Fair Food Network. At the time of this writing, the research team is currently waiting to receive a document from Fair Food Network with considerations that retailers and other partners may have if exploring integrating EBT and nutrition incentive programs within their state.

Lastly, the research team mapped potential partners that continue this work, particularly to initiate the Letter of Intent (LOI) process for additional funding. It is expected that this additional funding will focus on planning, partner engagement, and developing pilots for future activation. For example, funding could assist in subsidizing point-of-sale systems for farmers and/or within farmers' markets, as well as to develop marketing and education materials that can inform SNAP benefit holders about this program. The FoodMap NY team initially spoke with two NYS organizations, ADKAction and Glynwood to discuss their interest in leading this work. ADKAction is a non-profit operating in the Adirondack State Park, and has experience operating their own nutrition incentive program through its Fair Food Program.⁹ They have deep connections in the region with potential partner sites. Glynwood operates in the lower Hudson Valley and has run a CSA as a SNAP program,¹⁰ leveraging nutrition incentive dollars. Both organizations are keen to engage in this work and to uncover payment innovations that could help drive additional support for expanding food access and nutrition incentive uptake. However, due to other competing priorities and organizational capacity, we mutually determined that neither organization was the right fit to lead this work into the future.

Ultimately, after several conversations, the research team decided that Field & Fork Network, with their deep expertise and experience in the field of nutrition incentives, would be an ideal organization to continue this work. The organization, based in Buffalo, New York, is a GusNIP grantee that leads the state's Double Up Food Bucks program, which is the likely program for integration given the programmatic eligibility requirements (e.g. only fruits and vegetables), technical expertise, and relationships with retailers and farmers' markets across the state, all of which will be critical in successfully launching the program. At the time of this writing, Field & Fork Network submitted a Letter of Intent to the Mother Cabrini Foundation to receive additional funding for this work.

Next Steps

While FoodMap NY-affiliated organizations may not be the lead(s) on EBT and nutrition incentive integration in New York State in the future, the team has identified specific next steps to ensure the continuity of this work moving forward:

1. The New York State Office of Temporary and Disability Assistance (ODTA), the state agency tasked with providing food assistance benefits to NYS residents, is in the process of converting from the current EBT contractor, Conduent, to Fidelity National Information Systems (FIS), with an expected completion date of summer 2024. FIS was awarded the \$46 million contract following an RFP process on June 6, 2022. Other states have used FIS as their processing platform for nutrition incentive integration programs, ensuring feasibility of this project in NYS. Luke Posniewski, the EBT Bureau Chief, is well-versed in the technical adjustments that will have to occur to pilot and subsequently implement this program across the state.
2. As stated, Field & Fork Network will likely be the lead agency on this project. GusNIP grantees have also been the lead agencies in other states that have launched nutrition incentive integration programs, including with FIS. FIS' programming is not yet compatible with nutrition incentive programs that provide benefits for foods other than fruits and vegetables, such as NYS' Fresh Connect program; therefore, Field & Fork Network's Double Up Food Bucks program is likely the only feasible program for this project. Memorandums of understanding should be drafted for Field & Fork Network and involved agencies to delegate responsibility amongst stakeholders.
3. Field & Fork Network, in partnership with state agencies, will need to decide the matching percentage, and dollar cap per day, week, or month (if any).
4. Technical assistance provided by the National Grocers' Association recommended delegating decisions related to the retailer(s) in which nutrition incentive integration will be launched to the lead agency. Field & Fork Network has robust relationships with retailers and farmers' markets across the state and is best-positioned to identify the appropriate retailer(s) moving forward. Similar to Washington State, it is recommended that the program be piloted in one geographic location or in a select number of retailers prior to launching state-wide.
5. As the program continues to expand across the state, it is recommended that resources be devoted to consumer advertising and education. Technical assistance provided by the National Grocers' Association recommended working with customers, in-store nutritionists (if available), management, and farmers market staff to mitigate potential confusion amongst consumers during the programmatic transition. Resources, including marketing samples¹¹ and store projects,¹² are available via the Nutrition Incentive Hub website.
6. Lastly, considerations should be given to funding continuity. It is recommended that state budget appropriations be provided for the initial pilot and launch of the program, including for changes to technological systems, point-of-sale systems, as well as to develop marketing and education materials. Currently, the State of New York provides Field & Fork Network a \$2 million budget appropriation, indicating the state's willingness to engage in food and nutrition-related work.

TEAM ACKNOWLEDGMENTS

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