# The CSA Farmer's Nationwide Guide to Accepting SNAP/EBT Payments



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#### **About This Guide**

#### Who is this Guide For?

This national guide was written for farmers who operate community supported agriculture (CSA) programs. CSA farms can vary quite a bit, but essentially they are a model for marketing direct to the consumer. Typically, CSA farms sell vegetables but fruit, meat, dairy and other products are growing in popularity. Customers purchase a share (aka a "membership" or a "subscription") and in return receive a box (bag, basket, etc.) of food grown by the farm each week (other intervals are common) throughout the farm's season. These shares may be picked up at the farm but often one CSA farm will deliver to multiple pick-up locations in different cities or neighborhoods and sometimes deliver direct to the customer. Often the customer pays upfront which gives the farmer capital at the beginning of the growing season when it is most needed.<sup>1</sup>

CSA farms were not created as just another avenue for direct marketing. Instead, farmers adopt this model as a way to address certain social, economic and environmental goals. CSA farms directly link producers with consumers, allowing people to have a personal connection with their food and the land on which it is grown. This intimate connection between farmer and community strengthens local economies by keeping food dollars within the local community; it helps to ensure that the farmer receives fair compensation; it encourages stewardship of the land and addresses the costs of organic production; and it makes nutritious, affordable, wholesome foods accessible and widely available to community members.

## **About Zenger Farm**

Incorporated in 1999, Friends of Zenger Farm is a non-profit farm and wetland in Southeast Portland that models, promotes and educates about sustainable food systems, environmental stewardship, community development and access to good food for all. With the combination of a 10-acre wetland adjacent to the 6-acre organic farming operation, we provide unique experiential learning opportunities for youth, beginning farmers and the public in subjects such as sustainable agriculture, wetland ecology, food security, healthy eating and local economic development.

# Acknowledgements

This guide is made possible with a USDA Specialty Crop Block Grant and Kaiser Permanente's Healthy Food Access Initiative.

This guide is written in part based on the experiences of a 2011 and 2012 pilot CSA program at Zenger Farm that accepted SNAP payment for half of the shares sold. In addition to our experiences, we interviewed the few CSA farmers in Oregon who accepted SNAP payments prior to 2013 and based this guide on their experiences as well.

<sup>&</sup>lt;sup>1</sup> LocalHarvest, localharvest.com/csa

## Oh, SNAP! What Is It?

SNAP is the federal Supplemental Nutrition Assistance Program, formerly known as the Food Stamp program. The SNAP program "is designed to promote the general welfare and to safeguard the health and well being of the Nation's population by raising the levels of nutrition among low-income households." SNAP is administered by the Food and Nutrition Service (FNS) which is an agency of the United States Department of Agriculture (USDA). SNAP provides financial assistance to low-income people to purchase food. Instead of stamps, every state now has a debit card system known as Electronic Benefit Transfer (EBT). The EBT card has different names in different states. In Oregon, it is known as the Oregon Trail Card.

## **Benefits of Accepting SNAP Payments**

First, there is a financial benefit. CSA farmers anecdotally report they are having trouble selling all of their shares in recent years. It's hard to overstate the size of the SNAP program. Over 47 billion Americans received a SNAP benefit in 2012. That's one in seven Americans with an average monthly benefit per household of \$278.17. That's well over 74 billion dollars each year nationally. In short, many Americans have a huge amount of money that they can't spend at your CSA unless you accept SNAP payments.

Farmers markets are doing it, so why aren't we? Between 2007 and 2011, SNAP payments at farmers markets increased from \$1.6 million to 11.7 million. In December 2012, over 20% of the famers markets in the nation and over 50% in the Portland Metro area accepted SNAP payment. This trend demonstrates a growing demand among SNAP participants to use their benefit to buy direct from farmers.

Second, there are social justice benefits: Everyone deserves access to healthy food, regardless of their income level. And the US government has a program with that very goal: SNAP. Every CSA farmer takes pride in the nutritious, wholesome, ultra-fresh food that they grow. Imagine the synergy that could take place if more CSA farmers participate in the SNAP program and make their wonderful food available to 15% of Americans who may not otherwise be able to afford it. The benefits don't stop when the CSA membership ends. CSA members are often challenged by the amount and variety of foods in their share and develop cooking skills that will help them maintain a healthy diet for the rest of their lives.

Right or wrong, we've all heard the criticism that CSA farms only serve the affluent. Many CSA farmers try to address this perception by accepting sliding-scale payments, work-trade arrangements or donations to food banks. While these are all worthy and effective methods to increase participation of low-income families (and can work in tandem with SNAP payments), selling food below value or giving it away can make it difficult to earn fair compensation for your work. By accepting SNAP payments, you can help low-income families access healthy food without reducing your income.

<sup>&</sup>lt;sup>2</sup> See 7 CFR 271.1(a)

<sup>&</sup>lt;sup>3</sup> National Level Annual Summary, fns.usda.gov/pd/snapmain.htm

<sup>&</sup>lt;sup>4</sup> Supplemental Nutrition Assistance Program USDA FNS Benefit Redemption Division 2011 Annual Report, fns.usda.gov/snap/Retailers/pdfs/2011-annual-report-revised.pdf

## **Additional Considerations before Accepting SNAP Payments**

We talk more about building a successful relationship with SNAP members later (see page 9), but there are a few important points you should consider before deciding to accept SNAP payments.

First, SNAP members do not provide the same upfront cash infusion that other members would because they cannot pay upfront, but need to pay when they get each share. This is often not an issue for CSA farms, but there are a few ways to address it if you think this will be an issue for your farm. Collecting cash deposits from SNAP members can provide a small infusion. You could partner with a community-based organization and establish a revolving loan fund (see page 14). Finally, you can tweak your marketing and outreach to limit the ratio of SNAP members to other members. However, if you become SNAP authorized, you may not turn away customers simply because they want to pay with SNAP. <sup>5</sup>

Second, SNAP members will not provide the same amount of income as other members. When upfront-paying CSA members miss a pick-up or drop out, the farmer doesn't suffer a financial loss. You won't have that same certainty from SNAP members. Collecting a small upfront cash deposit provides an incentive to SNAP members to stick with it and limits your risk.

Finally, SNAP members generally will require more of your time than other CSA members. This is true if for no other reason than you have to collect payment from them every time they pick up their shares.

## **FNS Policy Change Recommendations**

As part of this project, Zenger Farm researched best practices and common challenges among CSA farms currently accepting SNAP across the nation. We have determined a number of national policy changes that would improve the process for CSA farmers and SNAP participants. To this end, we are taking steps to advocate that USDA FNS make changes in its policy around SNAP and CSA farmers. Our recommendations include:

- Allowing SNAP participants to pay for CSA shares in advance, either upfront or monthly.
- Creating a SNAP retailer application specifically for farm-direct sales with applicable terminology. This would include farm stands, farmers markets, CSA programs, etc.
- Clarification regarding the application of certain rules to the CSA model.

To be successful in our efforts to change national policy, broad support among farmers and a coalition of advocates will be necessary. If you are interested in joining, supporting, or just being kept up-to-date on these efforts, please visit OregonSNAPCSA.com and get in touch with us.

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<sup>&</sup>lt;sup>5</sup> See 7 CFR 278.2(b)

## **Envisioning SNAP at Your CSA**

#### The Basics

**SNAP eligible CSA farms**: Simply put, all CSA farms are eligible because they sell eligible food that they (or partner farms) grow. CSA farms meet the criteria of "more than 50 percent of their total gross retail sales in staple food sales."  $^6$ 

**SNAP eligible foods**: You can accept SNAP payment for any food that you grow intended for human consumption as well as plants and seeds that grow such food. You cannot accept SNAP payment for items such as hot foods, foods prepared to eat immediately, inedible flowers, decorative pumpkins or gourds not intended for consumption, medicine and vitamins, alcohol, tobacco and live animals.<sup>7</sup>

**Allowable charges**: You can only accept SNAP payments for the above eligible foods. There is one exception allowing SNAP payment for bottle deposits. Other than that, you cannot accept SNAP payment for a membership fee, administrative fee, delivery fee, deposit, taxes, etc. <sup>8</sup>

**You must collect payment at every share pick-up**: The rules are very clear. No SNAP payment before or after 10 pick-up. This means no upfront SNAP payment for the entire season. This also means no SNAP payment at the beginning of each month for multiple pick-ups that month or for a pick-up later that month. There are two narrow exceptions to this rule, one for partnerships with community-based organizations (see page 14) and another if you do not have access to a telephone (see the Prepared Voucher Model on page 8).

**Payments are direct-deposited into your bank account**: It takes about two business days for SNAP payments to post to your account. Financial institutions are not allowed to charge you for these deposits.

## **State-by-State SNAP Differences**

The SNAP program is a federal program with one set of nationwide rules. Currently, all SNAP applications for farm-direct retailers are processed through the national FNS office, not state or field offices (except in New York, see below). All the information in this guide should apply nationwide, with a few exceptions.

There are variations in the rules for Alaska, Native American tribes and reservations, and Puerto Rico which are not covered here. There may be other state-by-state differences as well. States may apply for a waiver from a portion of the federal rules and follow different rules but we are not aware of any waivers that would significantly affect a CSA. You also may encounter minor variations because states and different FNS field offices may interpret or implement the rules in slightly different ways.

For instance, New York has a different application process specific to CSA operations due to the work of Just Food. Just Food is a non-profit organization that connects communities and local farms with the resources and support they need to make fresh, locally grown food accessible to all New Yorkers. In the

<sup>&</sup>lt;sup>6</sup> See 7 CFR 278.1(1)(iii) or visit fns.usda.gov/snap/retailers/store-eligibility.htm.

<sup>&</sup>lt;sup>7</sup> See 7 CFR 271.2 or visit fns.usda.gov/snap/retailers/eligible.htm.

<sup>&</sup>lt;sup>8</sup> See 7 CFR 272.1

<sup>&</sup>lt;sup>9</sup> See 7 CFR 278.2(e) "Food retailers may not accept coupons before delivering the food..."

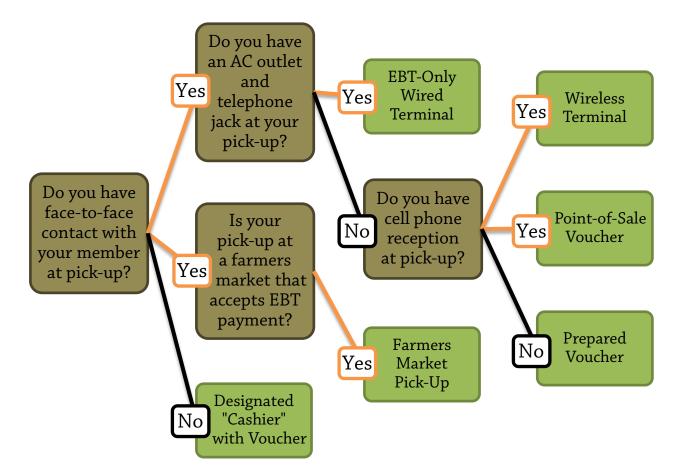
 $<sup>^{10}</sup>$  See 7 CFR 278.2(f) "Food stamp benefits shall not be accepted... in payment for items sold to a household on credit."

1990's, Just Food collaborated with their local FNS field office to implement a CSA-specific application process which involves sending a paper application to a specific individual at their field office who is familiar with and understands CSA farms (see Resources section).

## **Models for Accepting SNAP Payment**

The first thing to remember is that the SNAP rules remain largely unchanged since they were written in the 1970's when payments were made with paper coupons. These rules were primarily written for a traditional retail store conducting a point-of-sale transaction, meaning the customer selects food off the shelves and physically hands paper coupons to the cashier before leaving the store. Here, we present different models that do their best to shoehorn a CSA into the SNAP rules.

## Which Model Is Right for Your CSA?



#### **EBT-only Wired Terminal Model**

Pick-Up Situation: AC outlet, telephone landline, face-to-face interaction

Costs: Free (with minimum \$100 in monthly transactions)

This model most closely resembles a retail store. The state vendor will issue you a free terminal that only accepts EBT cards. Members get their shares from a staffed pick-up site. The farmer will swipe the EBT card, the member enters his/her PIN, one receipt prints for the member's records and another prints for your records. You can contact a third-party vendor to get a wired terminal that also accepts debit and credit cards, but there will be an additional cost.

#### **Farmers Market Pick-Up Model**

Pick-Up Situation: Shares picked up at market that accepts SNAP, face-to-face interaction Costs: Free (depending on your market's policies)

If you also sell at a farmers market, you can allow your SNAP members to pick up their shares at your booth. The member would just utilize the market's existing SNAP payment system. Obviously, you would need to have a conversation with your market manager before deciding on this model. Approach the situation from the perspective of the market manager. On the one hand, SNAP members may purchase something else from another vendor while picking up their shares. On the other hand, this is going to create extra work for the market (i.e., longer lines and time reconciling accounts) and possibly create aesthetic issues if your booth is overwhelmed with share boxes.

#### **Wireless Terminal Model**

Pick-Up Situation: cell phone reception, face-to-face interaction

Regular Wired Terminal Costs: \$600+ for terminal, \$45+ monthly, \$.15+ transaction fee iPhone/iPad/iPod Touch Costs: \$332+ for attachment, \$100 annually, \$.15+ transaction fee

In this model you're mobile because the terminal runs off a battery and communicates via cell phone networks rather than a land line. You might use a wireless terminal to make home deliveries or for an unimproved pick-up site or farm stand.

Wireless terminals can be EBT-only or can also accept credit and debit cards. You can also get an app and attachment for your iPhone/iPad/Ipod Touch. Vendors are listed in the resources section. You must obtain wireless terminals from a third-party vendor.

#### Point-of-Sale Voucher Model

Pick-Up Situation: cell phone reception, cell phone, face-to-face interaction

Office Requirements: internet access or EBT-only wired terminal (AC outlet and telephone land line)

Costs: Free (with minimum \$100 in monthly transactions)

This model allows you to be mobile or operate from an unimproved site without incurring the expenses of using a wireless terminal. Instead, you use a cell phone and a carbon copy receipt called a "voucher." The member gives you his/her EBT card, but instead of swiping it, you make a call to an automated phone system. After you enter in your FNS#, the card number and purchase price, the computer verifies the member has sufficient funds in his/her account and reserves them for you. This is called "voucher approval." You make a record of the transaction on the voucher and give a copy to the member. You then

have 15 days to "clear the voucher" when you have time in the office, which begins the process to transfer the reserved funds to your bank account. You'll need to clear the vouchers with the free EBT-only wired terminal (requires AC outlet and telephone landline) or in Oregon, and other states depending on your vendor, you can clear them online. Read more about vouchers on page 25.

## **Prepared Voucher Model**

Pick-Up Situation: no cell phone/coverage, face-to-face interaction

Office Requirements: internet access or EBT-only wired terminal (AC outlet and telephone land line)

Costs: Free (with minimum \$100 in monthly transactions)

This is just like the Point-of-Sale Voucher Model, but it is only available if you aren't able to have a telephone landline at the pick-up site and you don't have a cell phone or there is no cell phone coverage. 

Shortly before you leave the farm to deliver the share to the member and are still in the office, you can call the automated system and approve the voucher, filling out everything on the voucher except the member's signature. That way you don't have to worry about approving the voucher when the member picks up the share, you just need to get the member's signature on the voucher.

#### Designated "Cashier" with Voucher Model

Pick-Up Situation: No face-to-face interaction

Office Requirements: internet access or EBT-only wired terminal (AC outlet and telephone land line)

Costs: Free

Some CSA farmers leave several shares at a drop site, like an office building or home, and employees or neighbors will pick up their share at their convenience. The "cashier" doesn't have to be an employee, so you can recruit a CSA member to act as the "cashier" for that drop site. The "cashier" would then just need to collect the signatures and hold onto the vouchers in a secure location until you collect them. The farmer then has 15 days to retrieve the vouchers (at the next pick-up, for instance) and clear the vouchers back at the office.

## Isn't There an Easier Way?

Under the current rules, the farmer is taking a risk by not following the above models. The reality is that each EBT transaction is meant to be individually authorized at the time of purchase, either by signing a voucher or swiping the EBT card and entering a PIN. That authorization requires two people: the SNAP participant and the retailer (or retailer's agent). If there is a dispute or an audit, FNS is going to investigate to make sure that it was the SNAP member who typed in his/her PIN or ask the farmer to produce a copy of the voucher signed at the time of pick-up. If FNS finds you weren't following the rules, they can do all sorts of bad, but unlikely, things like take the money back, suspend or expel you from the SNAP program, and levy fines or prosecute.

<sup>&</sup>lt;sup>11</sup> See 7 CFR 274.3(a)(1)(i) "Retailers who do not have immediate access to telephones at the time of authorization shall be accommodated by an alternative system (e.g., manual vouchers with preliminary or delayed telephone verification) for redeeming Program benefits from eligible SNAP customers."

# **Working with SNAP Members**

The following section is based on a two-year pilot SNAP CSA at Zenger Farm and interviews of other CSA farmers in Oregon and nationally with experience accepting SNAP payments.

#### **General Considerations**

With one in seven Americans receiving SNAP benefits, SNAP participants are people from all walks of life. There is no stereotypical SNAP participant. The only defining characteristic is that they qualify for SNAP. In short, the SNAP participants who join your CSA are going to be a lot like your current CSA members.

That being said, every CSA farmer with SNAP members agrees that they require more attention and time. Three factors seem to contribute to this.

**First, SNAP members often have not participated in a CSA before.** So, the learning curve is the same as anyone who has not participated in a CSA before. They have to adjust to getting food at a set time and place rather than the convenience of grocery stores. They have to learn how to cook with new ingredients and greater quantities of fresh foods.

**Second, SNAP members pay at every pick-up.** Simply processing a payment at every pick-up is going to take more time (in fact, consider recruiting a member volunteer for this task). Beyond that, the act of paying every time reminds people of the value every time. In addition to this frequent reminder, members who have a limited income may be more vigilant about the value of their share. Finally, paying once upfront creates an emotional and financial investment that a pay-as-you-go system does not.

**Third, SNAP members lack a financial safety net.** It's worth stating the obvious: In order to qualify to participate in SNAP, people have to have a less than \$2,000 in the bank. <sup>12</sup> SNAP participants do not have a financial cushion to rely on when unexpected expenses come up and that can affect anyone's ability to stick with a CSA pick-up routine.

With these factors in mind, there are steps you can take to make your experience with SNAP members a success.

#### Outreach

The easiest and most effective thing you can do, if you distribute shares in Oregon, is register your farm at <a href="OregonSNAPCSA.com">OregonSNAPCSA.com</a>, which is currently being maintained by Zenger Farm. This website will feature an easy-to-search list of every CSA farm in Oregon that accepts SNAP. We will also have resources available for CSA farmers who want to learn how to accept SNAP and information about recommended policy changes to make the process easier.

Aside from registering at <a href="OregonSNAPCSA.com">OregonSNAPCSA.com</a>, you can update your website and other advertising materials. Consider including some variation of "We Welcome SNAP/EBT Customers" or "Oregon Trail Card Accepted." We have SNAP graphics created by FNS available for you to use at <a href="OregonSNAPCSA.com">OregonSNAPCSA.com</a>. You can also order SNAP posters and decals from FNS by calling (877)823-4369.

<sup>&</sup>lt;sup>12</sup> fns.usda.gov/snap/applicant recipients/eligibility.htm

Your current members are probably your best salespeople. Oregon CSA farms have had good success finding SNAP members simply by asking their current members to spread the word that you accept SNAP payment.

Reach out to community-based organizations in your area. While a partnership can be an amazing, mutually-beneficial experience (see page 14), don't limit yourself to a formal partnership. Maybe an organization would be willing to write a blurb in a newsletter, put up a flyer, or leave brochures out. Think beyond obvious organizations like food pantries and churches to neighborhood groups, food buying clubs, after school programs, etc.

Finally, call up the media. Let your local newspaper know that your CSA is now accepting SNAP payments and tell them why that is so great. What a great new angle on the CSA story! If you're located in Oregon, help out your other CSA farmers and make sure to mention <a href="OregonSNAPCSA.com">OregonSNAPCSA.com</a> so that people can learn about all the different options in their area.

## Starting the Relationship Off Right

A stitch in time saves nine. Starting off your relationship with clear expectations will save you so much time and headache later on. We strongly recommend a detailed member agreement for all members as your best tool to help you manage their expectations. Going one step further, we strongly recommend having a conversation with your SNAP members before they sign up to make sure that your CSA will fit well into their lives.

### **CSA Member Agreements**

If you ask 100 CSA members what they imagine a CSA will be like, you will get 100 different answers, and at least 100 different ways to disappoint your members. Instead of leaving it to their imaginations, let your members know what to expect when they sign up so you can make them happy later by meeting those expectations.

The following are important elements to include in all CSA member agreements:

- 1. Method to contact the farm
- 2. Your farm's growing practices
- 3. Products and quantities expected in the share
- 4. Location, date and times of pick-up
- 5. Payments, deposits, and/or refunds
- 6. Is the risk of crop failures shared? Is the reward of bumper crops shared?
- 7. Consequences of missing a pick-up

In the resources section at the end, we list a couple websites with excellent model CSA agreements (and a webinar) but they are not tailored to SNAP members. You can start with one of those model agreements and add in the suggested sections below.

### Special Considerations and Model Language for SNAP Membership Agreements

**Payment**. SNAP participants often run out of SNAP funds toward the end of the month, called "insufficient funds." You may not allow them to just make a bigger SNAP payment at the next pick-up. So, you will need to give them the option to pay some other way. In our experience, accepting cash usually works if you meet them face-to-face. If they pick-up from an unmanned drop site, we recommend collecting their credit card information on the member agreement and spelling out that you will charge their credit card if their EBT card has insufficient funds. You could also have a designated "cashier" collect a cash payment and pass it on to you at the next pick-up.

- [face-to-face pick-up] Payment: The cost of each share is [\$\_\_.\_]. You must pay for your share at every pick-up. You can pay with your EBT card or [cash/check/credit/debit/etc.]. If you have insufficient funds on your EBT card to make a payment, you still need to pay for your share when you pick it up with [cash/check/credit/debit/etc.].
- [unmanned drop site] Payment: The cost of each share is [\$\_\_.\_\_]. You must pay for your share at every pick-up. Before we drop-off your share, we will verify you have sufficient funds on your EBT card. If you have insufficient funds, you still need to pay and the only alternate payment we can accept is a credit/debit card. By completing and signing the section below, you are authorizing us to charge the following credit/debit card: [collect information].

**Deposits**. Since SNAP members cannot pay in advance for a share, we recommend collecting a deposit to provide them with an incentive to stick with the program and some compensation for you if they miss a pick-up or drop out. Deposits may not be made with SNAP funds. You must collect cash deposits (or check, credit, debit, etc.). We recommend collecting a deposit equivalent to the cost of two shares for a vegetable CSA or about 5-10% of the total cost. Try to make it small enough that SNAP members can afford it but large enough that it provides a good incentive. Address when they will get their deposit back and when they will lose the deposit (either partially or completely). Most SNAP members will want to get their deposit back as cash at the end of the season rather than applying their deposit toward the cost of their last shares.

• Refundable deposit: A deposit of [\$\_\_.\_] is required [by a certain date or with this signed agreement]. You may make your deposit with [cash/check/debit/credit/etc.] Your deposit will be refunded to you [at the last pick-up/by mail] as described in the missed pick-up policy (below).

**Missed Pick-Ups**. First, while it is not entirely clear, we do not recommend that you accept a SNAP payment for a share that the member did not get even if the member agreed to pick it up and failed to follow through. You may be putting yourself at risk with FNS if you collect a SNAP payment for food that was not "delivered." Second, we recommend giving SNAP members more flexibility to miss a few pick-ups because of their financial situation. At Zenger Farm, we allow them to miss 2 of 23 pick-ups. You may want to require notice if they are going to miss so that you don't needlessly harvest food. Remember: you can always be nicer than your member agreement and make exceptions when the situation warrants it!

Missed Pick-ups: It is your responsibility to pick up your share at the date and time of the scheduled pick-up. You may arrange for someone else to pay for and pick up your share if you

cannot.	
0	[no flexibility] If you miss a pick-up, the cost of a share [\$] will be deducted from your
	deposit. If you miss more than [] pick-ups, we may cancel your membership.
0	[some flexibility] You may miss up to [] pick-ups during the CSA season without losing
	your deposit. If you miss more than [] pick-ups, you will lose your entire deposit and we
	may cancel your membership.
0	[requiring notice] You may miss up to [] pick-ups during the CSA season without losing
	your deposit if you contact us and tell us that you will miss the pick-up at least [
	hours/days] in advance. If you do not give us enough notice, the cost of a share [\$]
	will be deducted from your deposit. If you miss more than [] pick-ups, even if you gave
	notice, you will lose your entire deposit and we may cancel your membership.

**Late Pick-Ups**: Whether you allow them or not, be very clear about your policy and procedures. A late pick-up is complicated by the payment process for SNAP members. Consider how you are going to collect a payment from the SNAP member if they come after hours. Remember that you cannot allow them to pay for their share at the next pick-up with a SNAP payment, but they can pay with cash, check, credit, debit, etc.

**Crop Failures, Bumper Crops and Consistency of Share Size**: In some CSA farms, members share the risks and rewards. Moderate variations are fine in a SNAP CSA, but not extreme variations. Using a vegetable CSA as an example, it's fine if you have no lettuce to give out because of a goose problem as long as you still provide other vegetables. It's fine if your spring share is a little smaller than your summer share (and make sure your members know to expect that by putting it in the agreement). It's not fine to abandon the whole harvest after a disaster and still collect SNAP payments for little or no food.

### **Have an Upfront Conversation**

Beyond a detailed member agreement, we strongly recommend having a face-to-face or telephone conversation with every potential SNAP member. At Zenger Farm, we had a substantial increase in member retention when we began having an upfront conversation. Learn a bit about their family and their eating habits. A family of five raw food vegetarians will almost certainly be underwhelmed by a typical vegetable CSA share while a busy young couple may be overwhelmed. Have they participated in a CSA before? What was that like? How is your CSA different? Explain how your CSA works. Go over the important points of the member agreement. Explain that this is a partnership where you are planning to grow food for them and relying on them to buy it later.

Make sure that your CSA will be a convenient fit for your new SNAP member. This is a preventative step. If your SNAP member has a financial emergency, you want it to be as easy as possible for the member to continue to participate in your CSA. The most common reason for SNAP members dropping out is related to transportation. Is your CSA pick-up location conveniently located for the SNAP member? Does your SNAP member have reliable transportation? Will your SNAP member have time to get to your pick-up location after work? Will your SNAP member grow to dread pick-up because of traffic? If you have any concerns, have a frank conversation with the member before he or she signs up.

## Maintaining the Relationship until the End of the Season

Do what you can to make sure SNAP members are enjoying their experience. The main consideration here is that they aren't going to enjoy their experience if they don't know how to cook the food you've grown for them. At the absolute minimum, send out a newsletter with recipes. Make sure you have paper newsletters available for folks without frequent internet access. Consider doing the occasional cooking demonstrations or even offering a cooking class. This is where a partnership with a community-based organization (see page 14) can really shine because they may have existing cooking classes that fit well with your CSA.

SNAP members aren't going to enjoy the experience if they don't feel like they are getting a good value. If the size of your share varies throughout the season, explain that very clearly upfront to your members. Think broadly about value. A rutabaga may cost \$2 in the store, but your members may value it at \$0. A trade basket, where members can leave items they don't want in exchange for items that other members didn't want, can help members balance it out for themselves. You may also just want to consider including more typical or popular foods in your share.

Value isn't just about price. Communicate value. Educate your members about the work that went into growing the food and how your growing methods differ from conventional industrial agriculture. There are so many ways to do this from farm visits, newsletter journals or just personal interaction. Talking about the weather isn't just small talk when members realize that you were harvesting their share in the driving rain or sweltering heat.

# Partnering with a Community-Based Organization (CBO)

Consider building relationships with the community by partnering with food pantries, churches, or other social service agencies with a mission to improve access to healthy food. One special benefit of partnering with a CBO is that they can accept SNAP payment up to 14 days before delivery. <sup>13</sup> When partnering to accept early payment, the CBO must be registered as 501(c)(3) and the CBO, not the farm, must be certified to accept SNAP payment. This works because there is an exception allowing 14-day prepayment for non-profit cooperative food buying clubs and the CBO would be acting as a food buying club. The SNAP members pay directly to the CBO and the CBO in turn pays the farmer.

The benefits of such an arrangement can't be overstated. The farmer saves a substantial amount of time not having to process payments at every pick-up and collecting payment in advance encourages member retention.

Even if the CBO isn't willing to process the payments, there are many potential benefits to such a partnership. The CBO may be willing to host a convenient location for pick-up. The CBO may be willing to help or handle the outreach to potential SNAP members or communications with current SNAP members. The CBO may be willing to support the SNAP members with recipes or cooking classes.

Finally, partnering with a CBO can offer a special benefit by establishing a "revolving loan fund." This practice is more prevalent in the Northeastern United States where CSA partnerships with CBO's are more common. A revolving loan fund is used to lend money to the farmer at the beginning of the growing season, helping the farmer with upfront costs. The fund is replenished when SNAP members buy their shares later in the season so that a revolving loan can be made to the farmer at the start of every growing season. Additionally, you and the CBO may decide to use the fund to cover the farmer's lost income that results from a SNAP member dropping out or missing a pick-up. Because the loan funds would diminish every year in this situation, CBO's usually fundraise every year to make up the losses.

<sup>&</sup>lt;sup>13</sup> See 7 CFR 278.2(e) "However, a nonprofit cooperative food purchasing venture may accept coupons from a member of the cooperative at the time the member places a food order. The food ordered must be made available to the member within 14 days from the day the cooperative receives the member's coupons."

## Step-by-Step: Applying to Become SNAP Authorized (With Screenshots!)

Note: In our experience, it may be best to avoid contacting FNS with questions specific to a CSA farm. FNS employees are often unfamiliar with the concept of a CSA farm and may not understand how the SNAP rules apply to CSA farms.

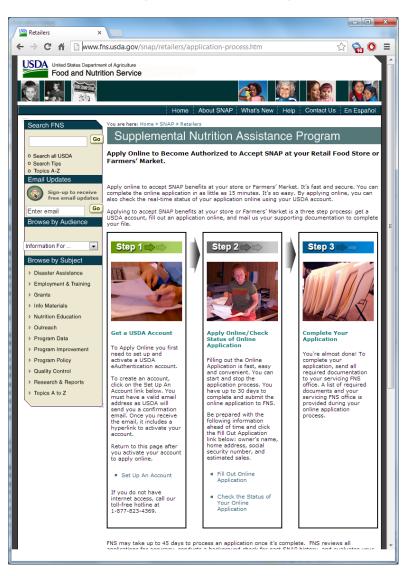
Note: New York CSA farms should follow a different application process (see Resources section).

## Step 1: Get a USDA Account

Visit <u>fns.usda.gov/snap/retailers/application-process.htm</u>. Click on "Get a USDA Account." Getting a USDA account just involves setting up a username, password and a series of security questions. However, it takes 20 minutes for your account to become active, so you will need to wait before continuing to Step 2.

## **Step 2: Apply Online**

Go back to <a href="mailto:fns.usda.gov/snap/retailers/application-process.htm">fns.usda.gov/snap/retailers/application-process.htm</a>. Click on "Apply Online/Check Status of Online Application." Sign in with the account you just created. You'll be able to click on "Start your application." That is followed by a couple pages of notes and warnings until you reach the application.



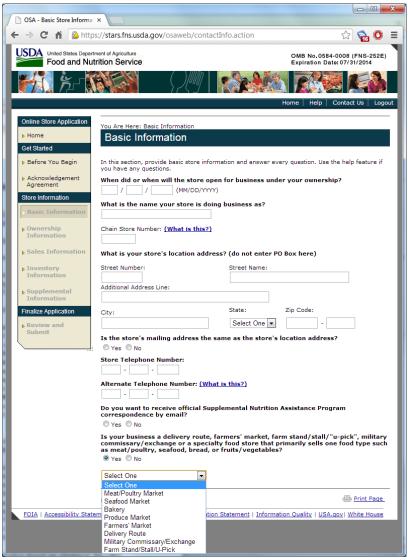
#### **Complete Basic Information**

"What is your store's location address?"

- Your SNAP authorization and FNS# are tied to one location. In practice, this has not been an issue and so we recommend only seeking one SNAP authorization. For CSA farms with multiple pick-up sites, be aware that you may meet some resistance from FNS suggesting that each pick-up site is a "store" requiring a separate SNAP authorization and FNS#. We think that a CSA with multiple pick-up sites much more closely resembles a farm "store" making group "deliveries" to pick-up sites, thus requiring only one FNS #.
- Farmers: Use your farm location unless you have a single off-farm pick-up site.
- CBO: CBO's should list the primary location where CSA members pick up their shares, which is likely at the CBO's site.

"Is your business a..."

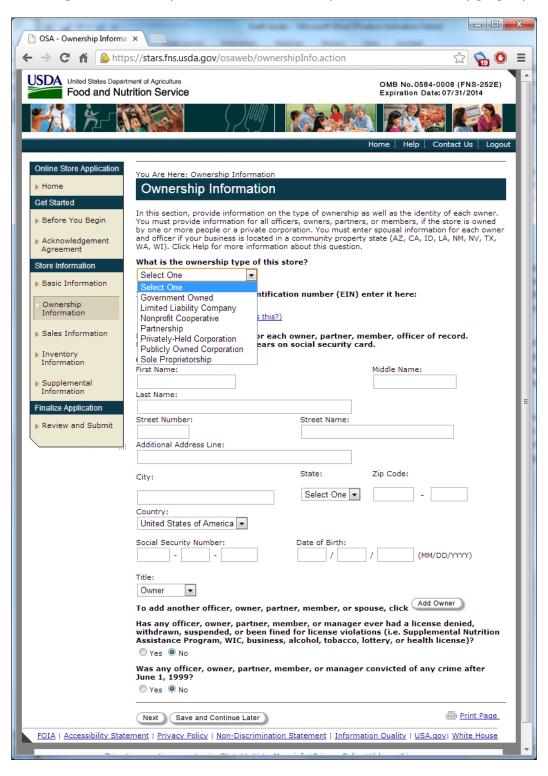
- Sign up as a "Farm Stand/Stall/U-Pick."
- We are trying to shoehorn the CSA model into the SNAP rules. What's the best fit? Think of your CSA as a seasonal farm stand with very limited hours of operation (whenever shares are distributed) that may also make "deliveries" to pick-up sites.



### **Complete Ownership Information**

#### Ownership Information

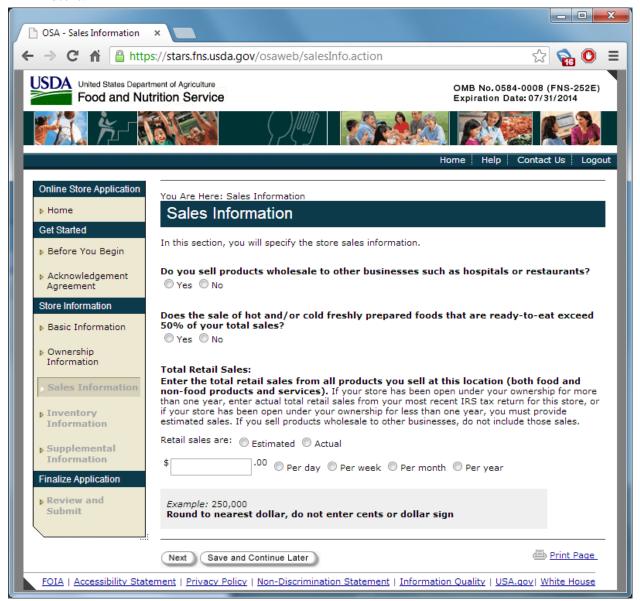
- What is the type of ownership of the store?
  - o Community-Based Organizations should sign up as Nonprofit Cooperative.
  - Most farmers will sign up as Sole Proprietorship.
- Don't list spouses unless they are owners or officers or you live in a community property state.



#### **Complete Sales Information**

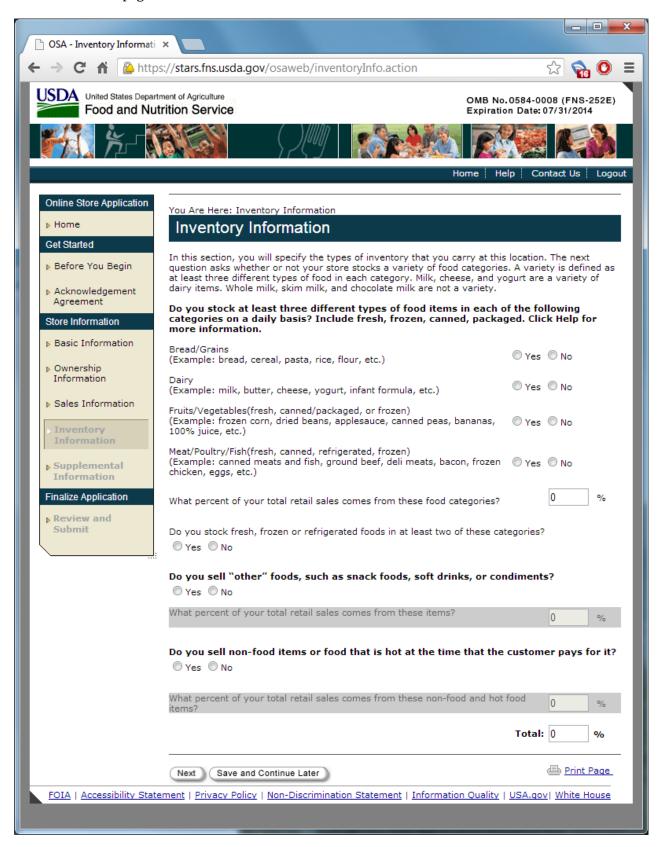
Do you sell products wholesale to other businesses such as hospitals or restaurants?

<u>All CSA farmers should answer NO</u>. The temptation is to think of your entire farm operation but
this application is for your CSA operation only. How many restaurants or hospitals are members of
your CSA? Probably none. Your CSA is a completely different sales venue than your wholesale
operations and they are not combined. This is not a company-wide application; it is for your CSA
"store."



#### **Inventory Information**

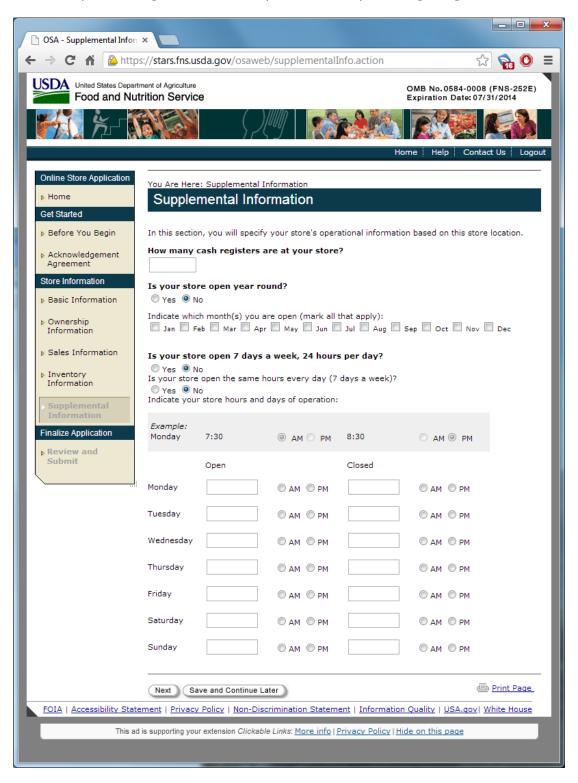
No caveats on this page.



#### **Supplemental Information**

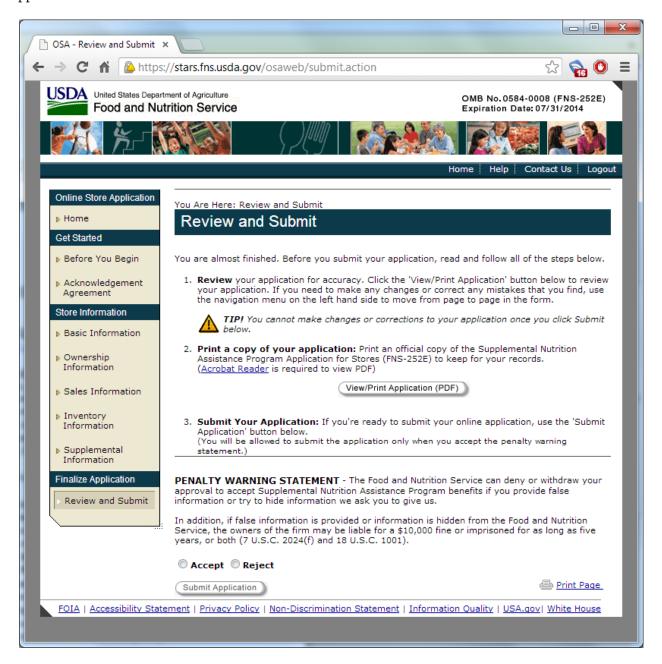
Is your store open year-round?

- Only check the months that your CSA provides food. Your EBT-only wired terminal is free only if you have at least \$100/month in SNAP sales during the months your store is open.
- Your weekly hours of operation are the days and times of your CSA pick-up.



#### **Review and Submit**

You're not done yet! Save or print a copy of your application for your records and then click "Submit Application."



## Step 3: Documents to Mail (screenshot on next page)

After you submit your application, the next page will request additional documentation and provide a mailing address. Your application will not be approved until FNS receives and reviews this documentation.

## **Required Documentation:**

### IMPORTANT: FNS may request different documentation from you based on your application.

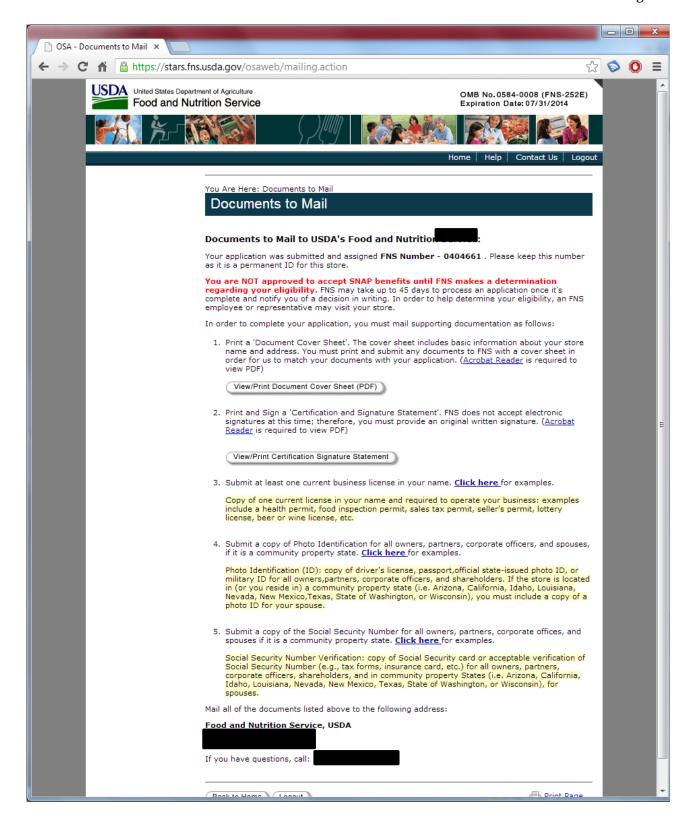
The following is a list of the typical documentation requirements and alternate documents that will satisfy those requirements.

- 1. **Document Cover Sheet**: You will download and print this at the end of the online application. This will include a copy of the list of all required documentation and the address to mail it to.
- 2. **Certification and Signature Statement**: You will download, print and sign this at the end of the online application.
- 3. **Copies of photo ID** (e.g., driver's license, state-issued photo ID, passport, or military ID) for all owners/officers listed on the application.
- 4. **Copy of Social Security card** or acceptable verification of Social Security Number (e.g., tax forms or insurance card) for all owners/officers listed on the application.
- 5. **Business License** (e.g., health permit or food inspection permit, sales tax permit, sellers permit, business license, lottery license, beer or wine license.).
  - This can be a little tricky for farmers because they often don't need a business license. The goal of this requirement is to verify your business exists. Farmers have had success using their business registration with the state. You can also call the FNS number listed on this page if you need help coming up with alternate documentation of your farm's existence. (In Oregon, filinginoregon.com/pages/business\_registry/index.html).
  - In the case of a community-based organization, your 501(c)(3) certification and bylaws are required instead of a business license.

# **Step 4: Wait for Your Authorization**

Again, it may be best to avoid contacting FNS with questions specific to a CSA farm. FNS employees are often unfamiliar with the concept of a CSA farm and may not understand how the SNAP rules apply to CSA farms.

FNS usually takes about two weeks to authorize a store to accept SNAP, but it may take up to 45 days. If you delay mailing in your documentation, your authorization will also be delayed. When you are authorized, FNS will send you a letter saying so and assign you an FNS number.



## I'm Authorized, Now What?

## Apply to Work with an EBT Vendor

Remember that the vendor is the one who actually processes the SNAP payment and transfers the funds to your bank account. From here on out, you will primarily interact with the vendor. The vendor will provide the customer support, vouchers, instructions on operating the terminal, etc.

## For an EBT-Only Free Wired Terminal

Depending on your state (Oregon does this), FNS will share your contact information as soon as you are approved with your state vender. Within a few days of your approval, you should receive a packet from your state vendor including a contract for you to sign and a form to fill out your bank deposit information. This packet will have questions and entire sections that do not apply to your farm (e.g., How many checkout lanes does your store have?). Simply write "N/A" for "not applicable."

Once your state vendor receives the completed contract and forms (you can fax them in), they will ship your terminal to you and you should have it in less than a week. In Oregon, a representative from FIS will actually call you a few days after you receive your terminal to help you set it up. Even if you don't plan to use a terminal, relying only on vouchers processed online, you will still need to work with a vendor.

#### **For All Other Terminals**

If you want to process credit/debit cards or have a wireless terminal, you will need to select a third-party vendor (see Resources section). You can start this process as soon as you get your SNAP approval and have your FNS #.

# **More about Using Vouchers**

## **Approving a Voucher**

This is the process that verifies the SNAP member has sufficient funds in his account and reserves them for your farm.

- 1. With your SNAP member's EBT card in hand, fill out: card number, cardholder name, your FNS #, transaction type, dollar amount, date and time, and your farm "store" information.
- 2. Call the automated hotline (number is on the voucher). You will need to enter: your FNS #, the card number, transaction type (purchase or refund) and dollar amount.
- 3. The automated hotline will tell you if that amount is authorized and give you an approval number. Write the approval number down on the voucher.
- 4. Then, you sign the voucher, the customer signs the voucher, and the customer gets a carbon copy for a receipt.

## **Clearing a Voucher**

This is the process that transfers the funds reserved for your farm to your bank account. You have 15 days after approving a voucher to clear it. In about 2 business days, the cleared funds will be deposited in your bank account.

- 1. You can use your terminal to clear vouchers or in Oregon, and other states depending on your vendor, you can clear them online at your vendor's website.
- 2. If you are using the terminal, you can get more detailed instructions from the vendor, but basically you will need to type in the card number, dollar amount, approval number and voucher number. The terminal will print off a grand total if clearing multiple vouchers at once.
- 3. The process to clear vouchers is much easier online. Recordkeeping is a little more difficult when clearing vouchers online because the website does not store a history or print off a grand total.

# SAMPLE OFFLINE FOOD VOUCHER

4	V	V	V	V	V
#	Л	Л	Λ	Λ	Λ

Merchant: If voice authorization is denied, USDA-FNS regulations prohibit you from representing this voucher for	APPROVAL NUMBER	TRANSACTION DATE/TIME	
payment.	Amount \$	Store FNS Authorization Number	
Card Number (Print all digits of card number)	□ Purchase	□ Refund	
	Print Store Name		
Print Cardholders Name	Store Phone Number		
	Store Address		
X Date			
Cardholder Signature By signing this voucher, I believe food funds are available for the full amount of this transaction. If funds are NOT available,	Store City/State/Zip code		
the State may direct that future month's benefits be deducted under specific circumstances.	Store Supervisor/Clerk Signature		
	X		
In the event of a dispute, if any information in shaded areas has been altered, charge back may occur FIS 2pt 5/10 White Store Copy Yellow Customer Copy	Vouchers must be cleared on POS device within 15 days.		

#### Resources

## **Vendor Contact Information**

The Oregon Farmers' Market Association has an excellent online guide to selecting a vendor: <a href="https://oregonfarmersmarkets.org/EBT/system\_provider.html">oregonfarmersmarkets.org/EBT/system\_provider.html</a>.

- For the free EBT-only wired terminal
  - o For a list of state vendors by state, go to <a href="mailto:fns.usda.gov/snap/retailers/merchants.htm">fns.usda.gov/snap/retailers/merchants.htm</a>
  - o In Oregon: <u>ebtedge.com</u> or (800)894-0050
- For iPhone, iPad, or iPod Touch terminals Mobile Market + from WorldPay
  - o Steve Eyring, steve.eyring@worldpay.us, (801) 302 9924
- For all other terminals (More vendors exist besides these)
  - FIS (Fidelity National Information Services, Inc.) (eFunds was acquired by FIS) fisglobal.com or (800)822-6758
  - o Merchant Source merchantsource.com or (800)313-5198
  - TSYS Merchant Solutions
     tsysmerchantsolutions.com or (800)354-3988

## **Model CSA Member Agreements**

- Illinois Direct Farm Business directfarmbusiness.org/model-csa-agreements
- Farm Commons (including a webinar) farmcommons.org/csa-operations

## OregonSNAPCSA.com

• A website listing every CSA farm in Oregon that accepts SNAP payment along with information for CSA farmers about accepting SNAP and ways to get involved and change SNAP rules for CSA farms.

# JustFood.org, a Resource for New York CSA Farms

 Here is a link describing New York's CSA-specific application process that Just Food developed with their local FNS field office. Just Food provides many other valuable resources for CSA farmers. justfood.org/tipsheet/csa-nyc-toolkit/food-stamps-and-csa/becoming-certified-accept-food-stamps

#### Food and Nutrition Service Contact Information

In our experience, it may be best to avoid contacting FNS with questions specific to a CSA farm. FNS employees are often unfamiliar with the concept of a CSA farm and may not understand how the FNS rules apply to CSA farms.

- Online application to become a SNAP authorized retailer fns.usda.gov/snap/retailers/application-process.htm
- General training guides (much more useful for the typical retail store) fns.usda.gov/snap/retailers/store-training.htm