COLORADO FOOD SYSTEMS
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Improving Healthy Food Retail for Coloradans – March 2019

Developed by the Colorado Food Systems Advisory Council

Summary

The goal of the paper is to advise state government and other partner organizations on ways to enhance statewide accessibility to healthy foods by 1) increasing the number of food vendors that accept Supplemental Nutrition Assistance Program (SNAP) and Special Supplemental Nutrition Program for Women, Infants and Children (WIC) benefits and 2) maximizing opportunities for WIC- and SNAP-authorized food vendors to provide and influence purchases of healthier foods as identified in the Dietary Guidelines for Americans*. Such efforts will improve food access for those on food assistance and increase access to nutritious food for the entire community. Farmers, retailers, and local economies will benefit from the additional dollars spent by those receiving nutrition assistance.*

The Colorado Food Systems Advisory Council's (COFSAC) charge is to advance recommendations that strengthen healthy food access for all Coloradans through Colorado agriculture and local food systems and economies.

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I. Introduction & Overview

The Colorado Food Systems Advisory Council's charge is to advance recommendations that strengthen healthy food access for all Coloradans through Colorado agriculture and local food systems and economies. This paper identifies opportunities to improve healthy food access and strengthen our state's agricultural economy by:

1. Increasing the number of stores that accept The Supplemental Nutrition Assistance Program (SNAP) and The Special Supplemental Nutrition Program for Women, Infants and Children (WIC) benefits.
2. Maximizing opportunities for WIC- and SNAP-authorized food vendors to provide and influence purchases of healthier foods as identified in the Dietary Guidelines for Americans[1].

Access to nutritious food and enrollment in SNAP and WIC have been associated with improved health and decreased healthcare costs;[2,3] however, in many areas of Colorado and the United States access to food vendors that accept SNAP and WIC benefits is limited and access to nutritious food remains uneven, particularly in rural areas and in low-income communities. Between 2010 and 2015, the number of low-income households without reasonable access to a supermarket increased. Low-income zip codes have 30 percent more convenience stores, which tend to lack healthy food items compared with middle-income zip codes[4]. This lack of predictable access to nutritious food contributes to suboptimal diets leading to poorer health and a higher prevalence and poorer management of costly diet-sensitive chronic diseases (diabetes, cardiovascular disease, and obesity).[5]

Increasing the number of food vendors (supercenters/big box stores, supermarkets, grocery stores, corner stores, bodegas/tiendas, convenience stores, farmers' markets, dollar stores,

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[1] Dietary Guidelines for America 2015-2020.

[2] Carlson S and Keith-Jennings B, *SNAP Is Linked with Improved Nutritional Outcomes and Lower Health Care Costs*, Center on Budget and Policy Priorities, Jan 2018.

[3] Carlson S, WIC Works: Addressing the Nutrition and Health Needs of Low-Income Families for 40 Years, Center on Budget and Policy Priorities, March 2017.

[4] Alana Rhone, et al., Low-Income and Low-Supermarket-Access Census Tracts, 2010-2015, U.S. Department of Agriculture, Economic Research Service, January 2017.

[5] Micha R, *Association Between Dietary Factors and Mortality from Heart Disease, Stroke, and Type 2 Diabetes in the United States*, JAMA 2017;317(9):912-924.

[6] Havens E.K., Martin K.S., Yan J., Dauser-Forrest D., Ferris A.M. Federal nutrition program changes and healthy food availability. Am. J. Prev. Med. 2012;43(4):419–422

drug stores, and online food shopping) accepting SNAP and WIC benefits has been demonstrated to improve neighborhood food environments in multiple studies, because of the nutritious food stocking requirements. Within months of implementing the WIC stocking standards in convenience and grocery stores in Connecticut, stores offered more whole-grain products, fruits and vegetables.[6,7] Food vendors accepting benefits may also implement fruit and vegetable incentive programs, which utilize state and federal funds to provide additional fruit and vegetables grown in Colorado to SNAP beneficiaries at no additional cost. These financial incentives for healthy foods have been shown to increase healthy food purchases, healthy food consumption and increase sales and the use of food assistance (e.g., SNAP or WIC) at farmers' markets[8]. Food vendors can also employ other strategies such as evidence-based product placement and promotion strategies to improve diet quality and health.
In addition to strengthening nutritious food access, vendors that accept SNAP and WIC benefits can strengthen the local economy. According to a report by Hunger Free Colorado, the SNAP program brought in $3.1 Billion in federal dollars to Colorado retailers in the past five years [9] and WIC sales are a dependable source of revenue for many retailers, as WIC consistently channels approximately $54 million to WIC-authorized food vendors in Colorado each year[10]. The reliable and consistent federal dollars that these programs bring to food vendors is critical for sustaining small and large businesses in Colorado.

The goals of this paper align with two state blueprints released in 2017 and 2018, *The Colorado Blueprint for Food and Agriculture* and *The Colorado Blueprint to End Hunger*.

II. Overview of Federal Food Assistance Programs in Colorado

Supplemental Nutrition Assistance Program (SNAP)

Program Description: The United States Department of Agriculture's (USDA) Supplemental Nutrition Assistance Program (SNAP), formerly known as the Food Stamp Program, provides food purchasing benefits, access to a healthy diet, and education on food preparation and nutrition for low-income households. Recipients spend their benefits (provided on an electronic card that is used like an ATM card) to buy eligible food items at authorized vendors.

Eligible Populations: Eligibility for SNAP is determined based on a combination of factors including income, resources, household composition, and citizenship status. Once determined eligible the benefit is based on income and certain living expenses.

As of June 1, 2018, households are eligible for SNAP if their household income (determined by household size) is at or below 200 percent of the Federal Poverty Level. Households that are receiving public assistance (Temporary Assistance for Needy Families or Supplemental Security Income) are categorically eligible for SNAP regardless of income[2].

[2-7] Carlson S, WIC Works: Addressing the Nutrition and Health Needs of Low-Income Families for 40 Years, Center on Budget and Policy Priorities, March 2017.

[8] Freedman DA, Mattison-Faye A, Alia K, Guest MA, Hébert JR. *Comparing Farmers' Market Revenue Trends Before and After the Implementation of a Monetary Incentive for Recipients of Food Assistance*. Prev Chronic Dis 2014;11:130347

Participation Rates: In 2015, 15 percent Coloradans (812,553) were eligible for SNAP, yet only 8.9 percent (489,906) were enrolled, meaning that SNAP enrollment in Colorado is 58 percent of those eligible. According to the USDA in 2018, Colorado is ranked 45th in the nation for enrollment rates[3]. SNAP enrollment varies widely across the state. For example, in Routt County (home to Steamboat Springs), only 28 percent of eligible residents are enrolled, whereas 64 percent are in Denver and 97 percent are in Las Animas County[4]. See the Blueprint to End Hunger Interactive Maps showing patterns of participation across Colorado. For additional information on the challenges and barriers that affect participation rates in Colorado, see background compiled by the Colorado Blueprint to End Hunger.

Participant Overview: Table 1, from the Colorado Department of Human Services, provides information about the age, race, presence of disability, income, and gender of SNAP recipients in Colorado as of May 2018.

Table 1: SNAP Participant Overview

Age	Count	Percentage
<18	200,849	44%
18-59	193,791	43%
60+	57,314	13%
Race	**Count**	**Percentage**
Race/Ethnicity		
African American		9%
American Indian		1%
Asian		2%
Caucasian		36%
Hawaiian		<1%
Hispanic		23%
Multiple		17%
None		13%
Presence of Disability	**Count**	**Percentage**
Disabled	75148	17%
Reported Income Types	**Count**	**Percentage**
Earned income	63,723	28%

[9.] Hunger Free Colorado (2013). *Snap Makes Dollars and Sense for Colorado.* Retrieved from https://www.hungerfreecolorado.org/wp-content/uploads/2012/08/SNAP-Makes-Dollars-Sense-for-CO-2013-LR.pdf

[10.] Colorado Department of Public Health and Environment WIC Program, March 2018. Benefits, Colorado food assistance program. Retrieved from https://www.benefits.gov/benefits/benefit-details/1580

[3] USDA Food and Nutrition Service (2018). *Calculating the Supplemental Nutrition Assistance Program(SNAP) Program Access Index: A Step-by-Step Guide for 2016.* Retrieved from https://fnsprod.azureedge.net/sites/default/files/ops/PAI2016.pdf

[4] SNAP data follows the USDA/FNS Program Access Index methodology using 2016 data for large counties and the most recent three-year data for small and medium sized counties.

Unearned income	126,928	56%
Reported Income Types	**Count**	**Percentage**
No income	51,727	23%
Total Cases	225,205	
Gender	**Count**	**Percentage**
Total females	251,481	56%
Adult females	152,953	
Total males	200,466	44%
Adult males	98,145	

Benefit Package: The average monthly SNAP benefit in Colorado is $127.54[5]. Benefit amounts vary depending on the size of the household. The minimum benefit is $15. The maximum benefit varies based on household size and is determined by the specific household's income and expenses (but not the age of any household member). There are exceptions for some older adults that have a senior medical deduction, which can increase amount of benefit for this group. with low enrollment The chart below shows the maximum monthly benefit per household size.

Table 2: SNAP Monthly Benefits

Household Size	Maximum Monthly Allotment Effective October 1, 2017
1	$192
2	$352
3	$504
4	$640
5	$760
6	$913
7	$1,009
8	$1,153
Each Additional Person	$144

Supplemental Nutrition Assistance Program – Education (SNAP-Ed)

Supplemental Nutrition Assistance Program – Education (SNAP-Ed) is a federally funded grant program that supports evidence-based nutrition education and obesity prevention interventions and projects for persons eligible for SNAP. Federal program partners are USDA Food and Nutrition Service (FNS) and the National Institute of Food and Agriculture (NIFA), as

[5] State Activity Reports, 2002-2016, United States Department of Agriculture (USDA) Food and Nutrition Service, Supplemental Nutrition Assistance Program (SNAP), as of October 23, 2017.

well as the USDA. In Colorado, the Colorado Department of Human Services administers SNAP-Ed.

The goal of SNAP-Ed is to provide educational programs and messaging, as well as policy, systems, and environmental interventions that increase the likelihood that people eligible for SNAP will make healthy food choices within a limited budget and choose physically active lifestyles consistent with the Dietary Guidelines for Americans and Food Guidance System (MyPlate.gov). In Colorado, SNAP Ed also employs strategies to maximize SNAP enrollment. Colorado SNAP-Ed teaches SNAP-eligible families how to buy and prepare healthy foods; helps families stretch tight budgets while buying healthy options; introduces kids to fruits and vegetables through nutrition classes, school gardens, and healthier lunchrooms; and, makes positive and healthy changes to the policies, systems, and environments affecting low-income families. In 2017, Colorado reached 25,834 participants with direct nutrition education and an additional 417,608 (est.) participants with pro-active policy, systems, and environmental approaches at community and education sites.

Special Supplemental Nutrition Program for Women, Infants, and Children

Program Description: The Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) is funded by the USDA and provides nutrition education, breastfeeding support, healthy food, referrals, and other services free of charge to Colorado families who qualify. WIC's goal is to help keep pregnant and breastfeeding women and children under age five healthy. Children participating in WIC are more likely to eat more fruits and vegetables, be a healthy weight, receive preventative medical care, and be immunized. Women who participate in the WIC program give birth to healthier babies who are more likely to survive infancy. Colorado WIC has the highest breastfeeding initiation rate in the country at 82%. Extensive research has found WIC to be a cost-effective investment that improves the nutrition and health of families leading to healthier infants, more nutritious diets, and better health care for children.

Eligible Populations: To participate in the Colorado WIC Program, you must live in the state and meet the categorical eligibility requirements (pregnant, breastfeeding, postpartum, infant, or child up to age of five) as well as income eligibility requirements (with a combined household gross income of no more than 185% of the Federal Poverty Level). WIC is for all kinds of families: married and single parents, working or not working, mothers, fathers, grandparents, foster parents, and legal guardians. Certain applicants can also be determined income-eligible for WIC based on their participation in certain programs, including those already deemed eligible to receive SNAP benefits, Medicaid, or Temporary Assistance for Needy Families.

Participation Rates: There are an estimated 100,000 individuals who are eligible but not enrolled in WIC in Colorado, placing Colorado at 48th in the nation for enrollment. Similar to SNAP, enrollment rates vary by county. See the *Blueprint to End Hunger* Interactive Maps for more information on enrollment. For additional information on the challenges and barriers that

affect participation rates in Colorado, see the background information compiled by the Colorado Blueprint to End Hunger.

Participant Overview: In 2016, 61,727 Coloradoans participated in the WIC program. Of these, 24% were infants, 49% were children, 9% were pregnant, and 18% were non-pregnant mothers. Of Coloradoans on WIC, 30% reported participation in SNAP. Fifty-four percent (54%) identified as Hispanic and 58% had earned a high school diploma[6].

Benefit Package: According to the Colorado Department of Public Health and Environment WIC Program 2017 data, the average monthly food benefit is $53 per eligible participant (2017), and in many cases more than one eligible participant lives in the household. Benefits for the whole family are loaded onto one WIC card to make shopping as easy as possible for caregivers. In addition to food benefits, WIC provides personalized, age-specific nutrition education and individualized counseling on a variety of topics promoting healthy, active lifestyles, including consultation by registered dietitians for high-risk clients. These lessons can be face-to-face, online, or via phone. Breast pumps and breastfeeding support are provided by peer counselors and certified lactation specialists. Participants are referred to other community services such as health and dental care, well-child clinics, immunizations, other food programs, housing assistance, and resources for substance abuse and domestic violence.

Please visit www.endhungerco.org to find out more about efforts to increase enrollment in the state's federal food assistance programs, including WIC, SNAP, and child nutrition.

III.Retail Requirements

Requirements for SNAP-Authorized Food Vendors

SNAP-authorized food vendors must meet one of two staple food requirements: Criterion A (staple food inventory) or Criterion B (staple food sales)[7], or be authorized as a direct-market farming operation[8].

Staple foods are the basic foods that make up a significant portion of a person's diet and are usually prepared at home and eaten as a meal. Staple foods do not include prepared foods, heated foods, or accessory foods. There are four staple food categories: vegetables or fruits; dairy products; meat, poultry, or fish; breads or cereals.

Criterion A requires a vendor to stock, on a continuous basis, a certain variety and quantity of staple foods in each of the four staple food categories, including some perishable staple foods.

[6] Colorado Department of Public Health and Environment WIC Program, 2016

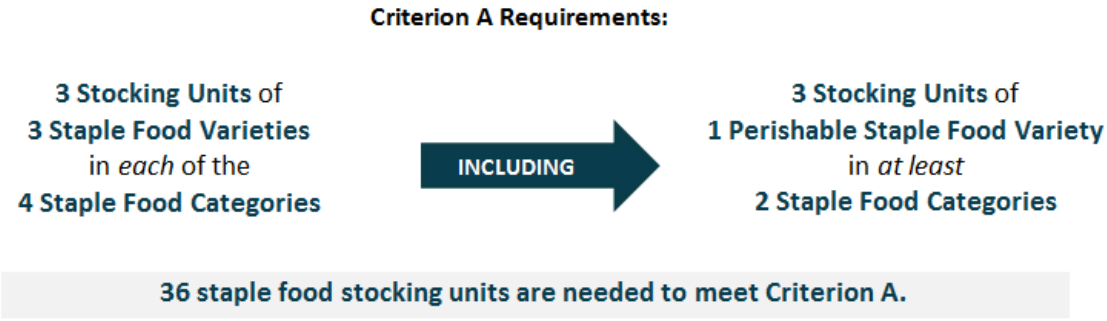
[7] USDA Food and Nutrition Service, Supplemental Nutrition Assistance Program (SNAP). *Is My Store Eligible?* Retrieved from https://www.fns.usda.gov/snap/my-store-eligible

[8] Eligible farmers' markets, direct-marketing farmers, military commissaries, nonprofit food buying cooperatives, group living arrangements, treatment centers, and prepared meal services (other than for-profit restaurants participating in state-option restaurant programs) may continue to qualify for free EBT equipment and services until further notice.

Most vendors are authorized under Criterion A. See Figure 1 below (Source: USDA Food & Nutrition Services).

Criterion B requires a vendor to have more than 50 percent of its total gross retail sales from the sale of staple foods. Specialty stores, like butcher shops, are often authorized under Criterion B.

Figure 1: SNAP Vendor Stocking Requirements



The 2014 Farm Bill also included and update to SNAP retailer stocking requirements. The USDA issued its final rule after an extensive public comment period in January 2018. The rule, "Enhancing Retailer Standards in the Supplemental Nutrition Assistance Program" made several changes to requirements for retailers that want to accept SNAP benefits, including requirements for more diversity and number of whole grain, produce, and other products. The final rule is available as of February 2019 at www.fns.usda.gov/snap/fr-121516. Many partners will be involved in ensuring retailers of all sizes can implement these new rules.

All authorized SNAP vendors must participate in the program by using Electronic Benefits Transfer (EBT) system equipment and transaction services. Most retailers are required to obtain and pay for EBT equipment and services on their own. An exception to this covers direct-market farming operations. The state is required to provide free wired EBT-only equipment to exempt retailers, which includes farmers markets and direct market farmers. The majority of markets have obtained wireless POS devices through grants or the FNS free equipment program (see footnote above). The Colorado Department of Human Services is currently funding 18 wireless devices for markets, but there is currently no additional funding to support more wireless devices. If a market is unable to purchase a wireless device or to obtain free equipment through a grant, the state will provide a no-cost wired device to the market. Most markets cannot support a wired device, however, as there is no connection at the market site.

Requirements for WIC-Authorized Food Vendors

WIC-authorized food vendors must be able to provide the allowable foods in the WIC package. Stores must carry an adequate variety and supply of WIC foods in each category and apply for authorization every three years. The WIC food packages vary and are assigned based on age

and nutritional risk. Packages include fresh and frozen fruits and vegetables, whole grains, breakfast cereals, milk, yogurt, soy products (including tofu), eggs, cheese, 100% juice, peanut butter, beans, baby foods, canned fish, and formula, and, when prescribed, special medical formulas. (Source: Colorado Department of Public Health and Environment WIC Program, 2016).

Table 3: WIC Food Vendor Regulations[9]

Topic	Notes
Procedures for redeeming food benefits in the retail stores	EBT machine required. Cannot collect sales tax on WIC foods, cannot exceed designated pricing level (established at authorization)
Minimum EBT lane coverages	Number of required terminals based on annual sales.
Topic	**Notes**
Vendor Authorization/Agreement	Every 3 years, all stores are reauthorized (including training, signing new agreement, updating pricing, application info, etc.).
WIC/SNAP Disqualification	If a store is disqualified From SNAP they are automatically disqualified from WIC as well.
Farms/Farm Stands/Farmers Markets	Individual farmers and farm stands can be authorized; current federal regulatory barriers to authorization of entire market (proposal under consideration). Limited by lack of wireless technology for WIC EBT (solutions under development).
Formula Sources	WIC-authorized vendors must purchase formula from a list of approved suppliers. This contract goes out for bid every five years.

IV. Food Vendors that Accept Federal Benefits

Food Vendor Types That Can Accept Benefits

Based on the regulations described above, Table 4 below provides an overview of what type of food vendors can accept SNAP and WIC benefits in Colorado. Colorado WIC currently authorizes grocery stores, military commissaries, farmers (with plug-in internet capabilities) and pharmacies. The USDA authorizes an even wider variety of market and food vendor locations to accept SNAP.

Table 4: Food Vendors That Can Accept Benefits

Retail Type	Can Accept WIC Benefits	Can Accept SNAP Benefits
Supermarket (e.g., Safeway)	□	□
Large, Medium, and Small Grocers	It Depends	□
Wholesale Grocers (e.g., Costco)		□
Corner/Convenience Stores (e.g., 7-Eleven)		□

[9] USDA, Supplemental Nutrition Program for Women, Infants and Children(WIC). *WIC Vendor Management Handbook (2017)*. https://fns-prod.azureedge.net/sites/default/files/wic/WIC-Vendor-Management-Handbook-Public-Version-9.17-508.pdf

Franchise Stores		
Combination Grocery (e.g., Dollar General)		
Farms/Farmstands		
Farmers Markets		
Community Supported Agriculture (food boxes)		
Military Commissaries		

Authorized Food Vendors in Colorado

Above, we describe who can be authorized to accept SNAP and WIC benefits, but what does this actually look like in Colorado? The tables below and maps in the appendices provide an overview of what types of food vendors are authorized across the state, where they are located, and how they overlap with the state's differential poverty levels and presence of households that participate in these federal food assistance programs. For reasons explained above about which food vendors can be authorized to accept SNAP or WIC, the vendor tables for SNAP and WIC cannot be compared.

Table 5: SNAP-Authorized Food Vendors in Colorado *(source: USDA Mountain Plains Region Food & Nutrition Services, March 2018)*

Grocery or Direct Market Types	Quantity	Percentage	Examples
Corner/Convenience Stores	1234	43%	7-Eleven, Circle K, Loaf 'N Jug
Combination Grocery	499	17%	Walgreens, Dollar General
Wholesale Grocers and Superstores	387	13%	King Soopers, Target, Costco
Supermarkets	213	7%	Safeway, Vitamin Cottage Natural Food Market
Medium Grocery Store	99	3%	Saguache Town Market Inc., Carniceria Sonora
Small Grocery Store	99	3%	El Azteca West, PJs General Store
Farmers Markets	75	3%	Broomfield Farmers Market, Downtown Grand Junction Farmers Market
Large Grocery Stores	50	2%	Niwot Market, Overland Foods
Farms/Farmstands	45	2%	Tierra Vida Farms, Gunnison Gardens
Other Types			
Bakery Specialty	105	4%	Papa Murphy's Pizza, Tortilleria Los III Americas
Meat/Poultry Specialty	26	1%	Seoul Market, The Butcher Block
Delivery Route	11	<1%	Schwans Home Service Depot
Drug and/or Alcohol Treatment Program	8	<1%	Salvation Army, Teen Challenge of Rocky Mountains

Meal Delivery Service	5	<1%	Meals on Wheels of East Boulder Colorado, Silver Key Senior Services
Military Commissary	4	<1%	Buckley AFB Commissary, Air Force Academy Commissary
Homeless Meal Provider	3	<1%	The Denver Rescue Mission, The Salvation Army
Fruits/Veg Specialty	2	<1%	Incredible Edibles Farm Fresh Market, Citlallis Market Inc
Food Buying Co-op	2	<1%	Mountain Song Community School, Trinidad Community Coop
Communal Dining Facility	1	<1%	Silver Key Senior Services
Seafood Specialty	1	<1%	Blue Reef Seafood Market
Total	2869	100%	

Table 6: WIC-Authorized Food Vendors in Colorado (source: Colorado Department of Public Health & Environment WIC Program, March 2018)

Type	Percentage	Approximate Quantity
Commissary	1%	4
Farm	<1%	1
Individual Store Grocery	13%	59
National Chain Grocery	78%	355
Medium Grocer /Multiple Locations	8%	34
Total	100.00%	454

Implications for the Expansion of WIC- and SNAP-Authorized Food Vendors

The tables above demonstrate a good deal of diversity across Colorado SNAP-authorized food vendors, but less so with WIC-authorized food vendors, which is largely due to program design and federal regulatory requirements. It is important to assess if the majority of SNAP- and WIC-authorized food vendors reflect the most common and desired locations for food shopping, particularly for low-income households. Data from the 2016 Public Attitudes About Agriculture in Colorado survey[10] show that the top five sources (in order) of where food dollars are spent are grocery stores, wholesale stores, health food stores, farmers markets, and home gardening, but 60% of SNAP-authorized vendors, for example, are convenience stores or combination stores such as Dollar General. When reviewing new policies and procedures to authorize more vendors, it may be important to take into account the current balance and mix of types of vendors to better align with shopper preferences.

Additionally, it is critical to examine where SNAP- or WIC- authorized food vendors are located in relation to SNAP and WIC recipients. Food vendors are authorized based on their ability to

[10] Colorado State University, Food System. Public Attitudes Survey. Retrieved from http://foodsystems.colostate.edu/research/colorado-blueprint/public-attitudes-survey/

meet stocking and other requirements, not necessarily based on their ability to meet community need or demand. The series of maps included in Appendix A showcase the location of SNAP-authorized food vendors in relation to SNAP recipients and of WIC-authorized food vendors in relation to poverty (since we do not have county-level data on WIC participation, poverty is used as a proxy).

These maps should help identify certain "hot spots" of need or opportunity in the state. They help identify where there is perhaps high program participation but low vendor access; where there might be WIC-authorized vendors but no SNAP-authorized vendors (if the vendor is WIC-authorized it is most likely eligible to accept SNAP); where farmers are SNAP-authorized and could thus be WIC-authorized; and, where unique opportunities might exist to meet certain local needs with certain types of food vendors (for example, farmers markets are almost non-existent in eastern Colorado, but there are many individual farms that could accept SNAP).

V. Current Conditions and Assets

Many initiatives across the state are currently focused on increasing access to healthy foods at SNAP- and WIC- authorized retailers. These examples provide important context for the recommendations that come later in this report, and can help inform new and innovative approaches to expanding the presence of WIC- and SNAP- authorized retailers in the state.

Healthy Corner Stores

- The Denver Healthy Corner Store Initiative: The Denver HCSI helps corner store owners expand and promote their healthy and fresh food selections. By working with storeowners, food distributors, and community residents, the initiative works to make it easier for families to find healthy food options. Eating more fruits, vegetables, and whole grains reduces the risk of heart disease, obesity, diabetes, and other chronic conditions.

Healthy Food Incentives

- LiveWell Colorado's Double Up Food Bucks Colorado: Double Up Food Bucks Colorado, managed by LiveWell Colorado, started at 42 locations in 20 counties in the summer of 2016. With Double Up, SNAP participants receive vouchers for up to an additional $20 in Colorado-grown fruits and vegetables when they buy SNAP-eligible items using their EBT card at participating farmers markets or select retailers. The 2017 evaluation of the program reveals Double Up nearly doubled in size (from 2016) in terms new customers (from 1,171 to 2,169), number of farmers accepting Double Up (from 276 to 470), and total dollars spent (from $160,946 to $334,074). Both customers and vendors responded that the program was economically beneficial to them. For consumers, the ability to stretch their dollars while providing healthy food for their families improved the perceived efficacy of the benefits.
- Garfield County WIC Incentive: This WIC farmers market bucks program is funded by the County Commissioners each year at $20,000. This is a budgeted line item. Each time WIC clients come in for a visit during the farmers' market season (June-September), they receive

farmers market bucks in $5 increments (on average, approximately $30 each visit) to purchase fresh fruits and veggies at any of the county's farmers markets. This program has been going on for 10+ years. Clients and local producers speak highly of the program. Producers turn in the redeemed market bucks at the end of the season and then Garfield County reimburses them. Some of this money is also used to do once-a-month farm stands in Parachute (where no farmers markets currently exist). County WIC educators purchase local produce from vendors and set up a stand in Parachute where clients and the public can pick up produce.

- Boulder County WIC Incentive: In partnership with Boulder County Public Health, Boulder County Farmers Market (BCFM) has been piloting a WIC incentive program at the Boulder, Longmont, and Lafayette farmers markets. The County had to discontinue the WIC program at the Longmont market since the $5,000 donation from BCFM to support this program quickly ran out. Funding from the City of Boulder's Sugar Sweetened Beverage tax will fund the program at the Boulder Market for the entire season. When WIC families show their eWIC card at the information tent, they are eligible to receive $20 in WIC farmers market vouchers each day that the market is open. The vouchers are valid for fruits, vegetables, meats, eggs and cheese. Totals for the Boulder Market from April through the end of June 2018 were: 1,144 total transactions; 205 unique transactions; $22,880 in WIC vouchers distributed; and, 254 children served. This program has been steadily growing throughout the 2018 season. For example, 87 WIC participants shopped at the Boulder market on a day in July of 2018. This resulted in the distribution of $1,740 in WIC incentives.

Healthy Retail Initiatives

- Colorado Fresh Food Financing Fund (CO4F): CO4F is a loan and grant fund that exists to support grocery stores and other forms of healthy food retail in underserved urban and rural communities across the state. It was created to help remove financial barriers preventing the construction, expansion, and renovation of grocery stores in underserved areas, with the ultimate goal of improving health and nutrition outcomes for Coloradans in those areas. Since 2013, CO4F has allocated over $5 million and assisted dozens of retailers, large and small, with new equipment purchases, inventory upgrades, transfer of ownership, and more. Among other eligibility requirements, all applicants must be authorized to accept SNAP. CO4F funding is provided by The Colorado Health Foundation, The Piton Foundation, Kaiser Permanente, and The Colorado Trust. Colorado Housing and Finance Authority (CHFA) serves as CO4F's administrator and provides the program's larger loans and grants, while Colorado Enterprise Fund (CEF) provides the program's smaller loans. Progressive Urban Management Associates (P.U.M.A.) provides outreach and technical assistance for applicants. More information is available at www.chfainfo.com/co4f.
- Colorado Enterprise Fund (CEF): CEF provides loans up to $500,000 to small businesses and start-ups unable to secure funding through traditional banks. CEF launched it's Healthy Food Fund (HFF) in 2013 with support from the Community Development Financial Institution (CDFI) Fund in the US Department of the Treasury, Colorado Fresh Food Financing Fund (CO4F), and the national ReFresh partnership (part of the JP Morgan Chase PRO Neighborhoods Initiative). The HFF provides loans to a variety of food-related

businesses in Colorado. To date, CEF has dispersed over $3.5 million to 45 food businesses, helping to increase food access in both urban and rural parts of the state, and strengthening the local food system. All grocery retail businesses that receive loans through the HFF must accept SNAP and, if possible, WIC.

Food Skills Education

- Share our Strength's Cooking Matters Colorado is the largest statewide SNAP-Ed implementing agency focused on building environments where healthy eating choices are available for everyone. Cooking Matters programs empower families with the skills they need to prepare affordable meals and shape lifelong healthy habits for children. We offer nutrition and food skills education to low-income parents and caregivers, especially those with children ages five and under, through interactive in-person nutrition and cooking classes and food retail tours that teach how to select healthy foods and shop more efficiently by using nutrition facts labels, unit pricing, and meal planning, as well as how to take advantage of incentive programs like Double up Food Bucks Cooking Matters also engages in policy, systems, and environment, working in coalitions on advocacy of child hunger issues and partnering on policy, systems, and environment work with food retailers and community organizations to make the healthy choice the easy choice for low-income families.

Innovative Authorization Pilots

- Bondadosa: Bondadosa is an online, community-oriented social enterprise that delivers fresh groceries and a full inventory of goods to homes in the Denver-Metro area. Customers can place orders in English or Spanish, and orders can be placed online, over the phone, or via text. Deliveries are made in temperature-controlled packages and delivered on electric powered vehicles. They offer a variety of products to choose from and accept cash, checks, debit/credit cards, and SNAP (for those who are elderly or disabled), helping make fresh grocery delivery more accessible.
- The GrowHaus: The GrowHaus accepts SNAP, Double Up Food Bucks, and WIC as part of their continued effort to ensure lasting access to healthy food for all people. The GrowHaus applied as a farm, as opposed to a full-service grocery store, in the fall of 2016 even though The GrowHaus does operate a small grocery market. This classification allows them to accept WIC benefits for fresh fruits and vegetables only instead of the full range of WIC-allowable groceries. The stocking requirements for accepting WIC as a grocery store are prohibitively extensive for the size and capacity of a small market but The GrowHaus is excited to be able to accept WIC for the produce they grow on site as well as what they aggregate from other farms and distributors. The GrowHaus is the first farm in Denver to accept WIC benefits.

VI. Current Barriers

Barriers for SNAP-Authorized Food Vendors in Colorado

Barriers for SNAP at Direct Market Operations

(Includes farmers markets, farms, and Community Supported Agriculture)

1. High costs of EBT equipment for markets with limited, but important, SNAP sales.
2. Limited technology in that EBT machines cannot be shared across sites and the EBT technology is often dated and machines often break.
3. Lack of local partner knowledge on how to become SNAP-authorized and troubleshoot problems and lack of knowledge about which machine to order.
4. Lack of local technical assistance for volunteers running EBT machines and lack of clarity on what paperwork and fees are required.
5. Lack of a centralized authorization process; markets must work through different agencies to register and get equipment and a lack of clarity around criteria for obtaining free equipment.

Barriers for SNAP at Supermarkets

6. Lack of Colorado-grown labeling at points of sale that would support the promotion of programs like Double Up Food Bucks or other nutrition incentives.

Barriers for SNAP at Small & Medium Grocers

(Includes corner stores)

7. Lack of local partner knowledge on how to get authorized and troubleshoot problems.
8. Lack of smaller store owners' awareness (especially outside of the Front Range) that there is a market for SNAP sales.
9. Lack of store knowledge, experience, and partnerships with regard to nutrition education and promotions.
10. Challenges for small stores to be SNAP authorized when it is hard to have competitive pricing with small quantities of food; produce spoils; there is limited inventory; refrigeration is expensive; there are concerns about fines for applying benefits to the wrong items; and, there is an inability to compete with the marketing of less healthy foods.
11. Limitations in distribution to smaller or more rural stores when there needs to be regional collective demand in order to get enough products delivered to be SNAP authorized.
12. Limited amount of technical assistance due to the inability of agencies to provide guidance on 30+ EBT vendors for stores to choose from and lack of clarity on potential for combination eWIC and SNAP EBT machines.

Barriers for WIC-Authorized Food Vendors in Colorado

Barriers for WIC at Direct Marketing Operations

(Includes farmers markets, farms, and Community Supported Agriculture)

13. Inconsistent support and capacity for tours, education, and outreach at WIC-authorized food vendors.
14. Strict requirements for matching funds and significant administrative burden for sponsor(s) of WIC Farmers Market Nutrition Program and Senior Farmers Market Nutrition Program.
15. Lack of a uniform WIC incentive akin to Double Up Food Bucks. While there are WIC incentives in several counties in Colorado, each are managed and funded differently, and outside of federal programmatic funding sources.
16. Inability to use WIC benefits at Community Supported Agriculture programs (CSAs), since benefits are allocated monthly, but CSAs often require a one-time flat fee.
17. WIC is limited to individual producers since current regulations restrict authorizing an entire farmers market.
18. Challenges of being able to use entire WIC benefit (not exceeding maximum, lack of ability to return funds to EBT card).
19. Concerns about directing more WIC customers to direct markets because of their inability to provide adequate choice the way grocery stores do, concerns about stigma for clients at markets that are or are perceived to be elitist or exclusive, and concerns about the high cost of produce compared to traditional grocery stores.
20. Limitations and costs of technology due to the start-up and ongoing expenses related to EBT processing machines and service; the need for WiFi at markets; and, USDA requirements for reconciliation and fraud prevention processes.
21. There is a need for clarity around regulations, as some WIC program requirements are federally mandated and some are authorized at a state level. Strategies are needed to advocate for desired changes with appropriate agencies and/or channels.

Barriers for WIC at Supermarkets

22. Inconsistent support and capacity for tours, education, and outreach at WIC-authorized food vendors.
23. Some stores may be priced out because prices must be kept to within 10% of other retailers in the designated peer grouping (based on federal requirements) and the costs of delivery and pick-up services not allowed as WIC expenses.
24. Ongoing training required for cashiers (high turnover) and inventory managers on authorized foods and sizes.

Barriers for WIC at Small & Medium Grocers

(includes corner stores)

25. Inconsistent support and capacity for tours, education, and outreach at WIC-authorized food vendors.
26. For smaller retailers without integrated functionality of point-of-sale systems, the stand-aside SNAP-WIC combination machines are only partially paid by WIC which means retailer takes on more expenses.

27. There are challenges for independent, limited-inventory, and warehouse stores to meet minimum stocking requirements (distribution, cost, space, other barriers) with current strong inventory requirements (~75-item minimum) for specific items and sizes.
28. Limitations in distribution to smaller or more rural stores when there needs to be regional collective demand.
29. Prohibitive cost of integrated point-of-sale systems and inventory management systems for smaller, independent stores.
30. There is a need for clarity around regulations, as some WIC program requirements are federally mandated and some are authorized at a state level. Strategies are needed to advocate for desired changes with appropriate agencies and/or channels.

VII. Opportunities for Moving Forward

Key:
CDHS: Colorado Department of Human Services
CDPHE: Colorado Department of Public Health & Environment
CDA: Colorado Department of Agriculture
NGOs: Non-Governmental Organizations/Non-profits
USDA FNS: US Department of Agriculture Food & Nutrition Service

Systems-Level Recommendations for WIC and SNAP Partners

Recommendation	Lead Entity	Addresses Barriers:
Remove costs and process barriers for direct market farming operations to becoming SNAP and WIC authorized by committing to provide no-cost EBT equipment through state contracts with EBT vendors.	CDHS	1, 2, 5, 20
Increase agricultural partners' awareness and engagement of SNAP and WIC and related incentive programs.	CDHS; CDPHE: NGOs	5, 6, 14, 15, 16, 17
Remove cost and process barriers for small stores to becoming SNAP and WIC authorized by establishing fee-sharing, grant funds, technical support, and other incentives.	USDA FNS; CDHS; CDPHE	12, 26, 29
Encourage partners to use the Colorado Proud logo to identify food and agricultural products grown, raised, or processed in Colorado.	CDA	6
Increase reach of food skills by providing integrated SNAP-Education and WIC education and Enrollment at food vendors.	CDHS; CDPHE; Cooking Matters	9, 10, 13, 19, 22, 25
Partner with retail associations to identify opportunities to move more fresh, healthy foods to vendors so they may meet or exceed SNAP and WIC stocking requirements in order to provide healthy foods in under-resourced areas.	NGOs; Advocacy organizations	10, 11, 23, 27, 28
Identify, promote, and increase financial support for scale-appropriate distribution systems (including farm-to-store and farm cooperatives).	NGOs; Advocacy organizations;	10, 11, 23, 27, 28

	Local government	
Continue support for broadband capacity expansion in rural areas of state to support use of hard-wired EBT machines.	NGOs; Advocacy organizations; Governor's Office	1, 2, 20, 29
Increase retail-based promotion of SNAP and WIC programs (e.g., improved identification of WIC foods on shelves, or other best practices).	USDA FNS; CDHS; CDPHE	8, 9, 10, 13, 19, 22, 25
Collaborate to make vendor information shared and centralized across SNAP EBT and WIC EBT, (e.g. a user-friendly, common webpage for information on becoming a vendor and troubleshooting problems).	CDHS; CDPHE	5, 7, 12, 21, 30
Strengthen Colorado participation in Federal advocacy opportunities regarding WIC and SNAP policies and regulations, such as store stocking requirements, EBT fees, relevant USDA public comment periods, and more.	NGOs; Advocacy organizations	1, 2,5, 12, 14, 15, 16, 17, 18, 20, 21, 23, 29, 30
Raise awareness about emerging innovations and potential opportunities in Colorado (e.g., WIC in small stores and at farmers markets) to national partners (E.g., National WIC Association) to garner support for needed policy change and/or supplemental funding.	CDPHE; NGOs; Advocacy organizations	1, 2,5, 12, 14, 15, 16, 17, 18, 20, 21, 23, 29, 30
Broaden SNAP and WIC coalitions to include additional state agencies, academics, businesses, medical and academic institutions, and other innovative partners to better understand and advance best practices in improving diet quality and food security through federal programs.	NGOs; Academic institutions; Advocacy organizations	All

Recommendations for SNAP Partners

Recommendation	Lead Entity	Addresses Barrier/s:
Implement the 2014 Farm Bill SNAP retailer stocking standards with support for small stores.	USDA FNS; County PH	10, 11
Expand and sustain Double Up Food Bucks with state support.	CDHS; LiveWell	1, 6, 8, 10, 11
Support more SNAP-Education at stores that helps EBT customers to access healthier foods while increasing produce consumption and sales.	CDHS; Cooking Matters	8, 9, 10

Recommendations for WIC Partners

Recommendation	Lead Entity	Addresses Barrier/s:
Continue current efforts to explore expansion to authorize farmers markets.	CDPHE	17, 19
Continue current efforts to explore expansion to authorize corner stores.	CDPHE	27, 30

Explore funding for "doubling" or incentive programs (which currently are not allowed federal expenses) for purchasing more fruits and vegetables similar to Double Up Food Bucks for SNAP.	CDPHE; USDA FNS; NGOs	15
Explore potential changes in vendor authorization policies to encourage more eligible vendor locations and types (E.g., expansion to Combination Grocery stores, home delivery, mobile markets, CSAs, and new models like delivery and mobile).	CDPHE; USDA FNS	14, 15, 16, 17, 18, 19, 20, 21, 27, 30

VIII. Appendix A: SNAP and WIC Authorized Food Vendor Maps

The county map, below, is provided as reference for the following maps of SNAP and WIC authorized stores. Counties are colored only to help delineate between county boundaries.

Figure 2: Colorado Counties

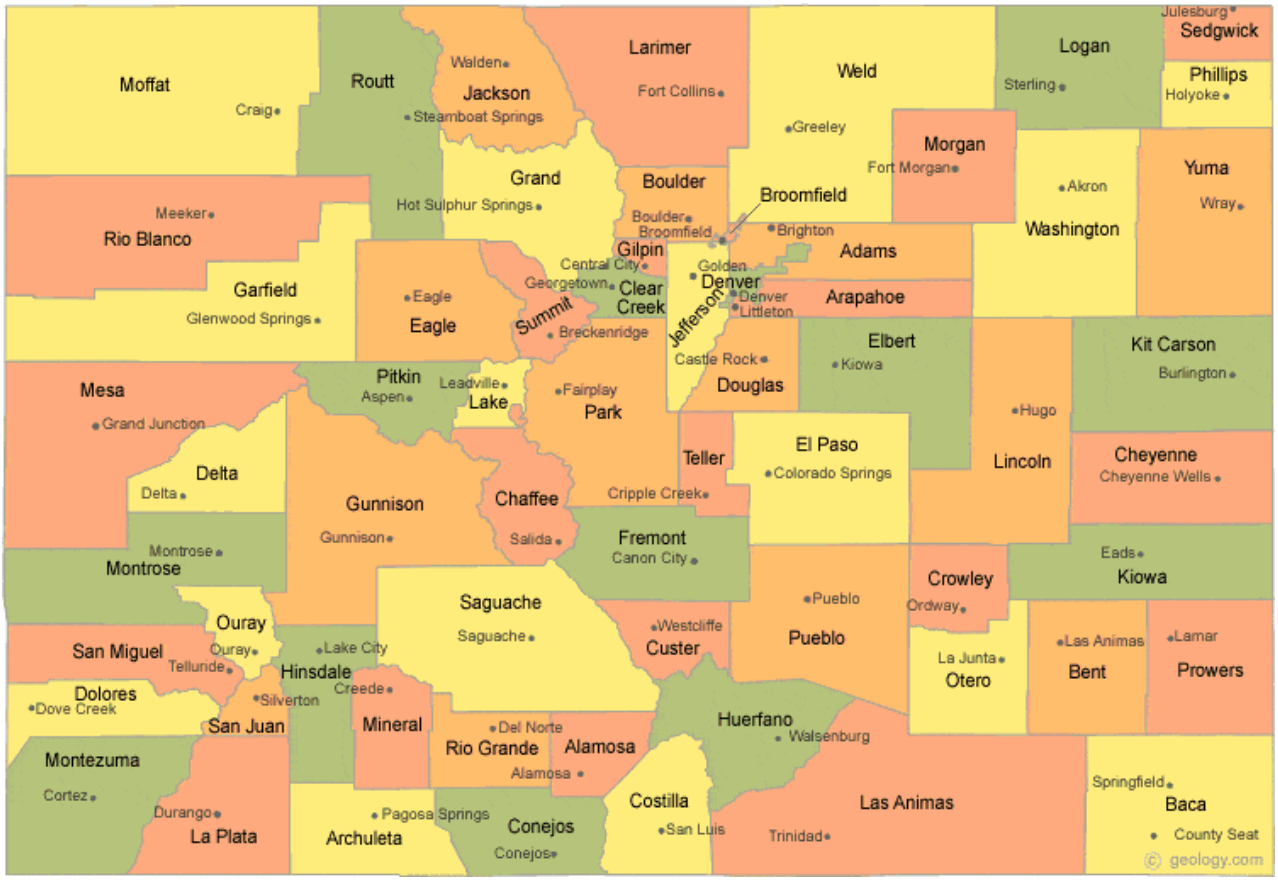


Figure 3 Colorado SNAP-Authorized Food Stores Overlaid Onto Households Receiving SNAP Benefits

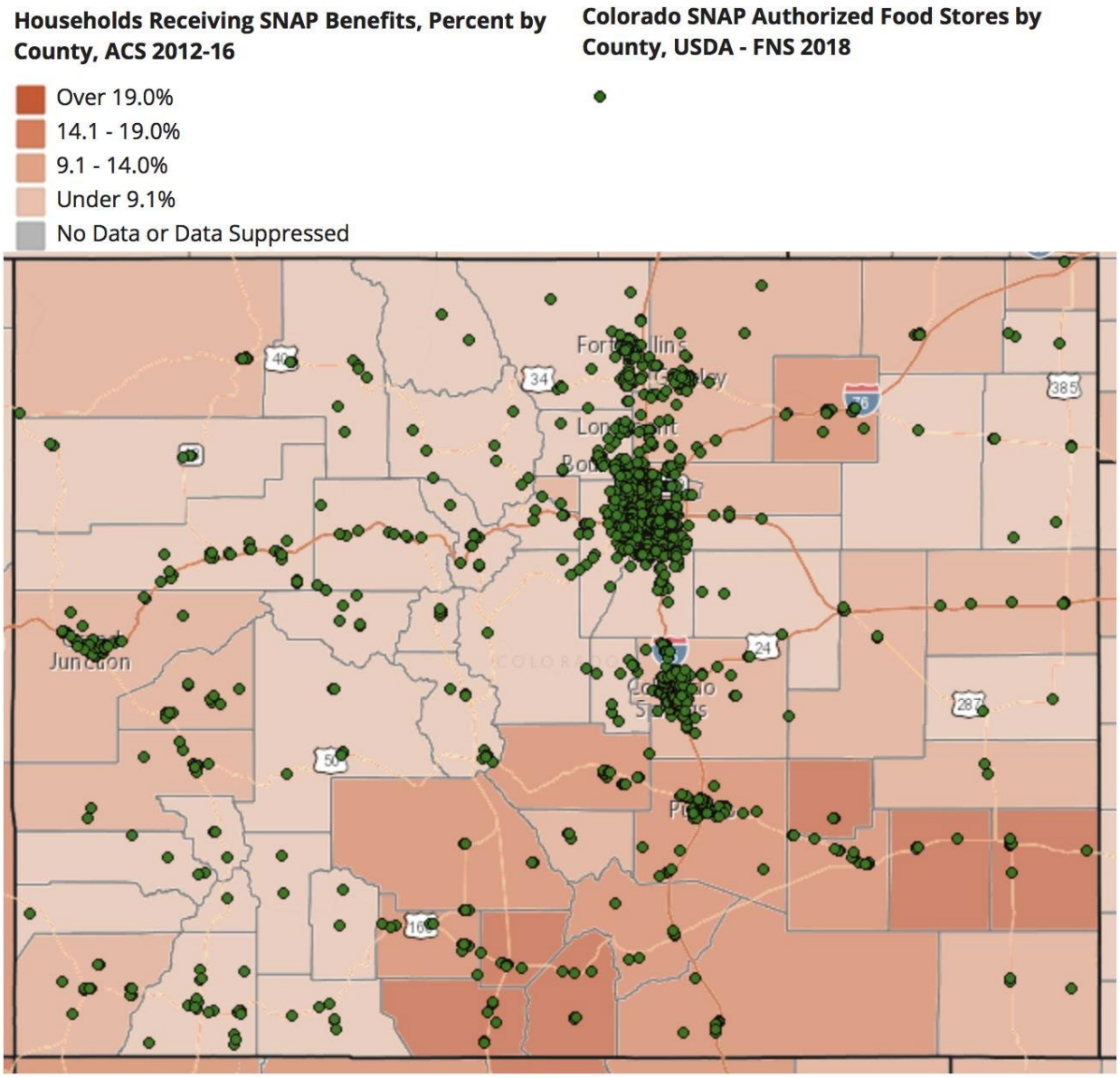


Figure 4: Denver Metro SNAP Authorized Food Stores Overlaid Onto Households Receiving SNAP Benefits

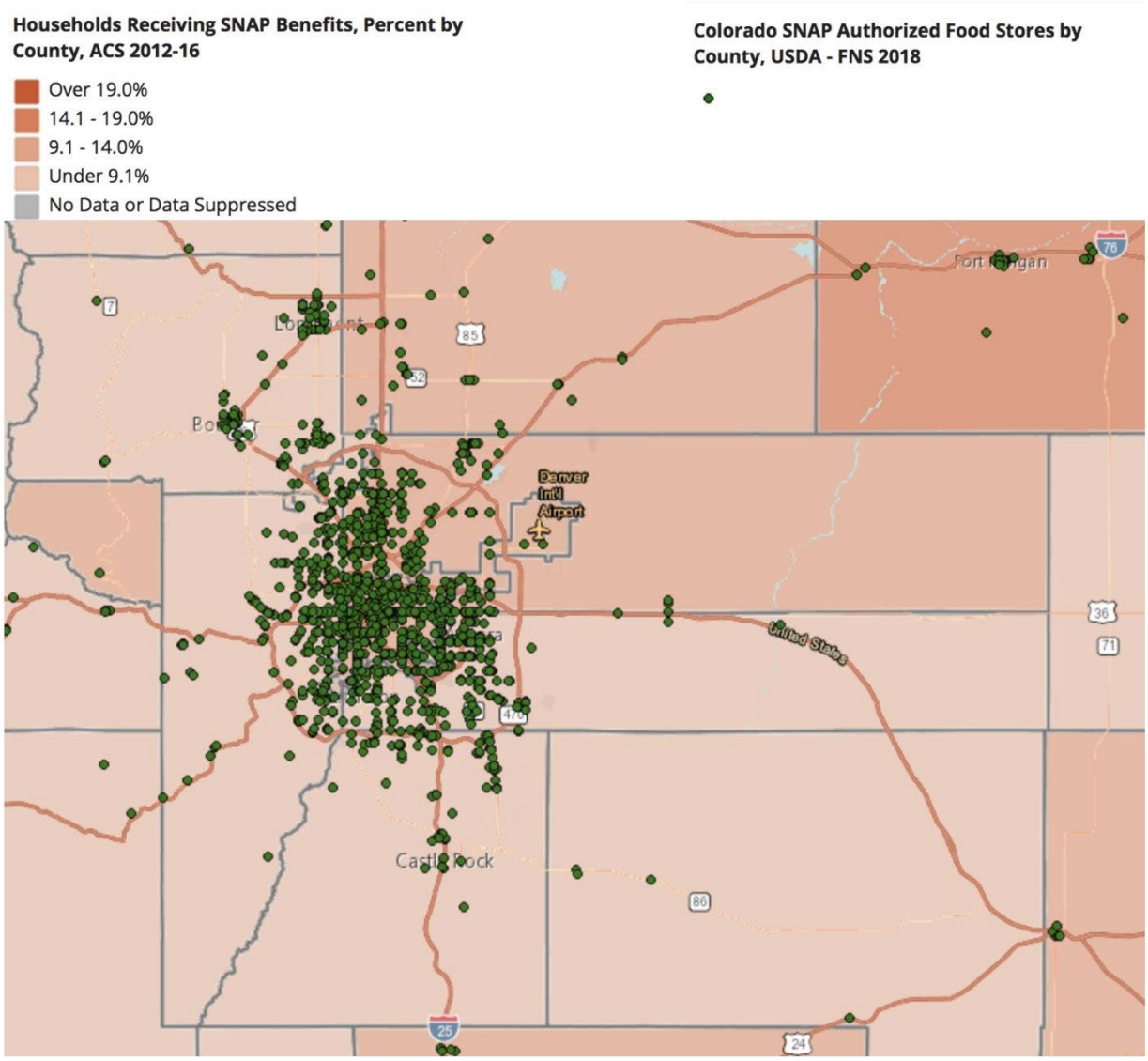


Figure 5: Colorado SNAP-Authorized Farmers Markets Overlaid Onto Households Receiving SNAP Benefits

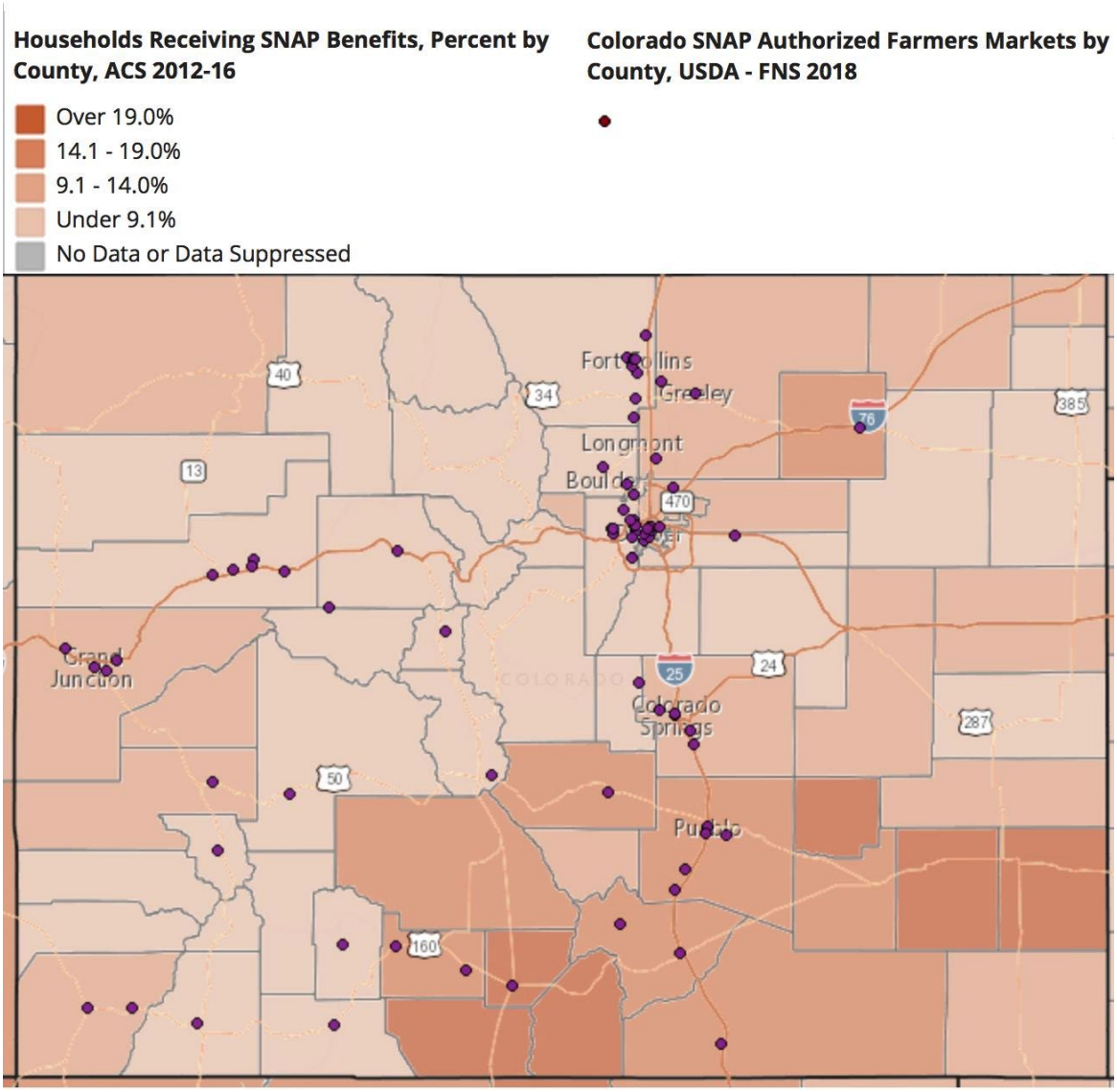


Figure 6: Denver Metro SNAP Authorized Farmers Markets Overlaid Onto Households Receiving SNAP Benefits

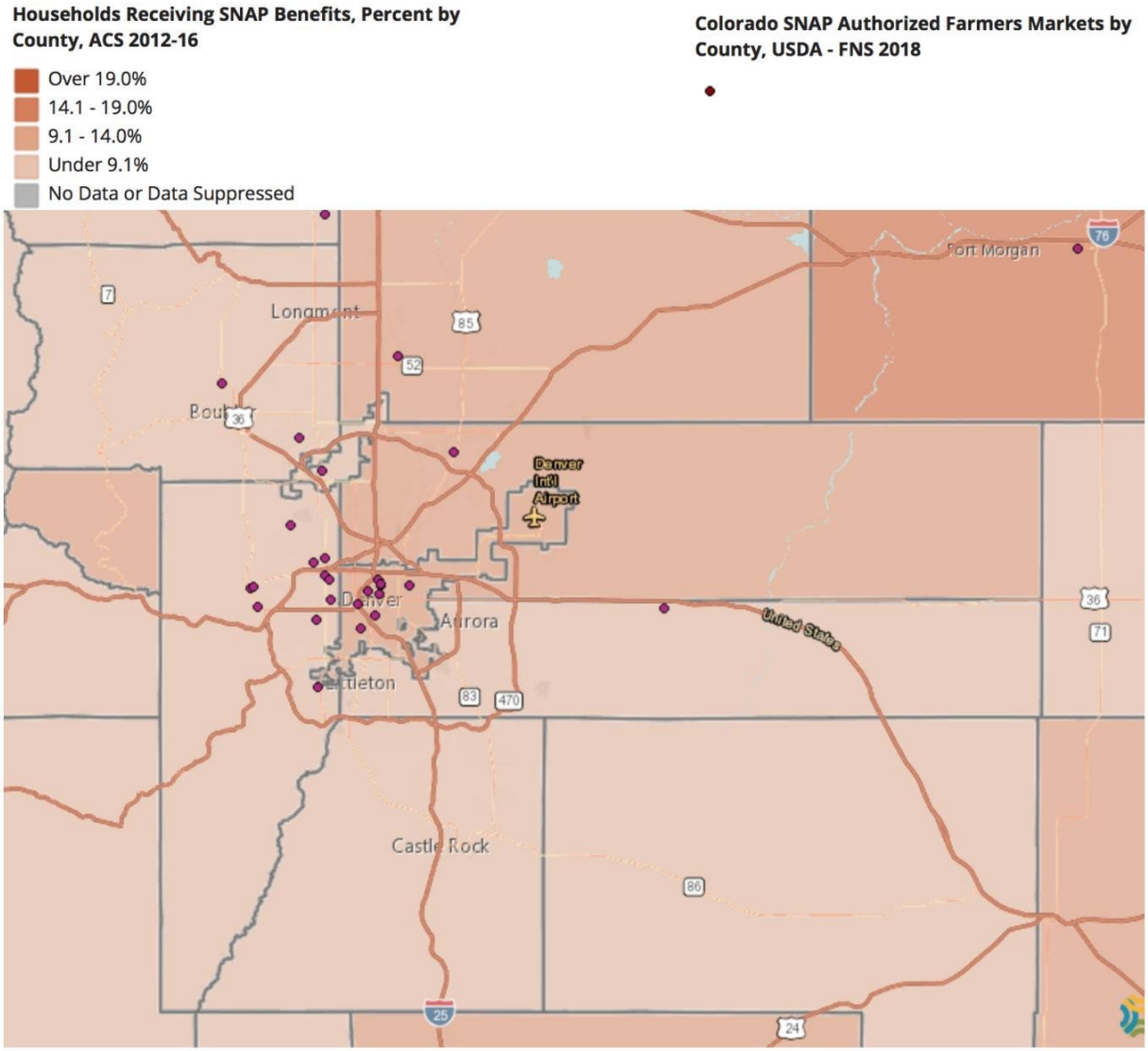


Figure 7: Colorado SNAP-Authorized Farmers by County Overlaid Onto Households Receiving SNAP Benefits

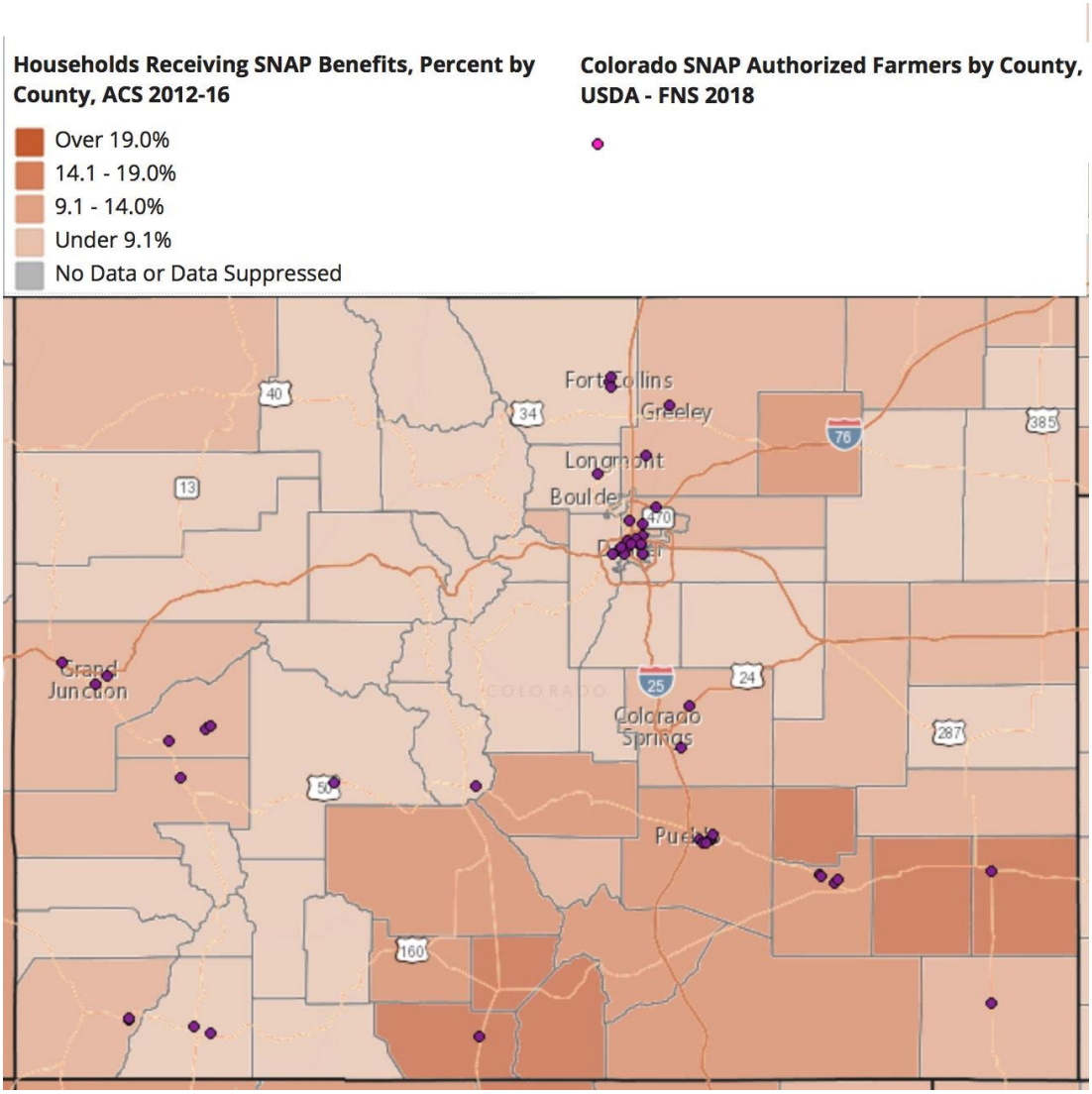


Figure 8: Denver Metro SNAP Authorized Farmers by County Overlaid Onto Households Receiving SNAP Benefits

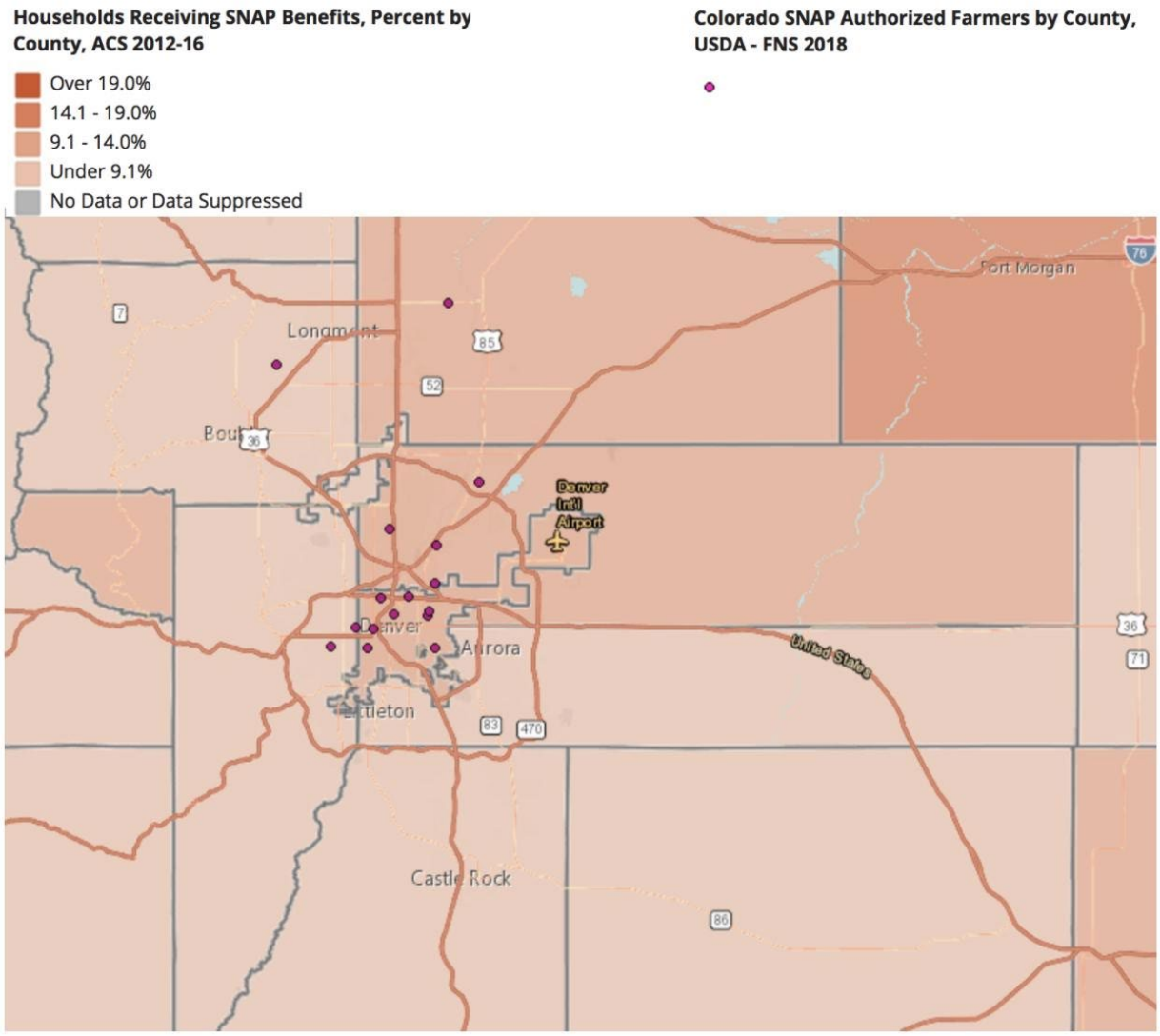


Figure 9: Colorado WIC-Authorized Stores by County Overlaid Onto Population Below the Poverty Level

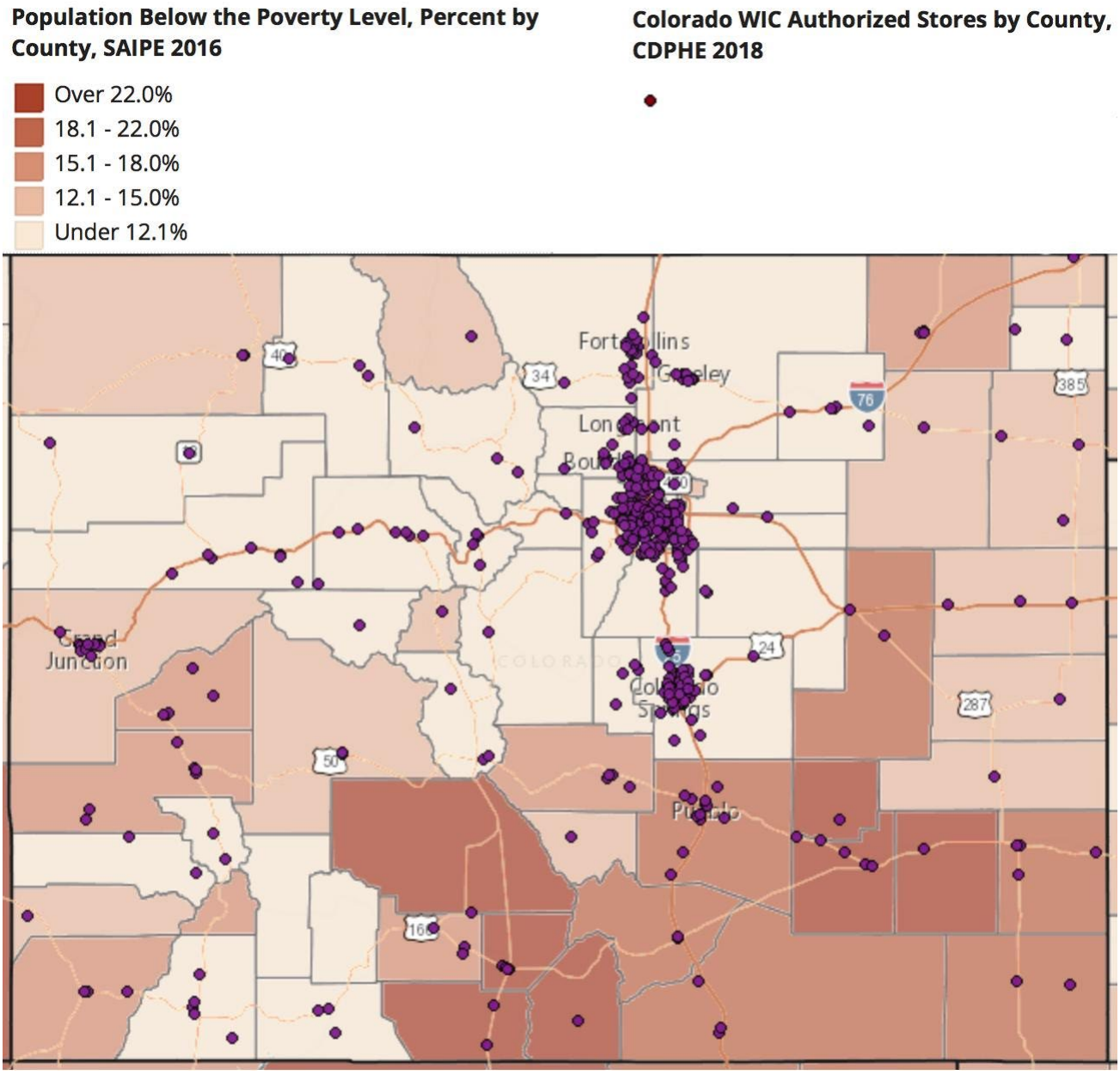


Figure 10: Denver Metro WIC Authorized Stores by County Overlaid Onto Population Below the Poverty Level

