

# Text to Connect

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Using Text Message Outreach to Reduce SNAP Churn

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## Guidebook Credits

This guidebook was written by Katie Sullivan and Sara Soka, Social Safety Net Benefits Fellows at the Beeck Center for Social Impact + Innovation at Georgetown University, in partnership with Keith Barnes, Senior Policy Manager at Benefits Data Trust (BDT). Thank you to Pauline Abernathy, Edmund Aristone, Erin Carr, Alexis Clark, Marisa Diaz, Lisa Dillman, Cynthia Edouarzin, Mary Falls-Staley, Shannon Flaherty, Bridget Gibbons, Erin Henderlight, Michael Johnston, Julia Kosov, Ryan Lauko, Imahni Moise, Jeneé Saffold, Karin Szymanski, Dennis Tolan, Samantha Volk Jennings, Alissa Weiss, Jessica Westbrook, Elisa Zygmunt, and everyone else at BDT whose generous time and insights were invaluable to its development. Thank you to Liz Lauros of the New York City Department of Social Services for input on the draft. Thank you to Taylor Campbell, Ashleigh Fryer, Waldo Jaquith, Ariel Kennan, Grace Lacy-Hansell, Elle Meyers, Kevin Parker, Shannon Felton Spence, Cori Zarek, and everyone else at the Beeck Center for Social Impact + Innovation for your guidance and editorial support. Support for this guidebook was provided by the Bill & Melinda Gates Foundation and Blue Meridian Partners. The findings and conclusions contained within are those of the authors and do not necessarily reflect the positions or policies of the foundations or partners.

This guidebook is part of a larger initiative by the [Beeck Center for Social Impact + Innovation at Georgetown University](#) to document innovations in social safety net benefits delivery driven by human-centered service design, data-informed practices, and responsive technology with a goal of spreading proven practices more widely. [Benefits Data Trust \(BDT\)](#) is a national nonprofit organization based in Philadelphia that uses these modern approaches to support government agencies in transforming how their residents access the social safety net. In 2017, BDT began a SNAP recertification text messaging program in New York City, and now partners with several states to implement similar programs suited to their needs.

Together, the Beeck Center and BDT authored this guidebook to detail practices so more states and local agencies can use text messaging to reach the people they serve with important, timely, and easy to understand guidance so people don't lose their SNAP benefits when they need them most. While we focus on the use case of SNAP recertification, we hope this content might be useful for anyone using text messaging to improve safety net benefits delivery in other ways.

You can find other resources on maintaining public benefits and more on the [Digital Benefits Hub](#). To discuss anything in this guidebook further, feel free to reach out to us at [digitalbenefits@georgetown.edu](mailto:digitalbenefits@georgetown.edu) and [partnerships@bdtrust.org](mailto:partnerships@bdtrust.org).

## About This Guidebook

### Who This Guidebook is for and What to Expect

This guidebook is designed for directors, project managers, policy staff, and field staff at state and local government agencies that administer the Supplemental Nutrition Assistance Program (SNAP), and who are interested in using text messaging to reduce recertification churn.

The goal of this guidebook is to explain how to scope and design a text messaging program to support SNAP clients through the recertification process.

Full of practical advice, instructions, and examples, this guidebook will help you navigate key decision points and considerations that have been gathered from similar efforts already underway. You can develop and implement your text messaging program in-house or partner with a vendor, and we offer guidance based on both scenarios.

Feel free to read this guidebook end-to-end or use sections as standalone resources. Visit the [Digital Benefits Hub](#) to view or download standalone guides for each core workstream. We encourage you to do this, as each guide may be best suited for a different person on your team.

## What This Guidebook Covers

There are a number of different workstreams involved in a text messaging program. This guidebook covers the following six workstreams core to any texting program, many of which are interconnected and happen concurrently:



There are likely other workstreams you'll want to consider, such as User Research, Procurement and Vendor Management, and Partnerships/Stakeholder Engagement. While this guidebook touches on some of these areas, we won't cover them in great depth here.

## Introduction: How Text Messaging Can Improve SNAP Recertification

The Supplemental Nutrition Assistance Program (SNAP) is a lifeline for millions of Americans. Currently, income-eligible residents must apply to receive SNAP benefits. To keep their benefits, clients must go through a renewal process to recertify their eligibility, typically every six to 36 months, depending on policies adopted at the state level. For many, this process isn't simple. Clients unable to complete the process accurately and/or on time lose their benefits and often end up reapplying for the program. This creates avoidable burdens for both clients and administrators.

Client “churn”—when a household exits SNAP and then re-enters the program within a relatively short period of time, such as 3-4 months<sup>1</sup>—is a longstanding pain point for clients, field staff, and agencies. A report from USDA and the Urban Institute found the estimated rate of SNAP churn across six states ranged from 17% to 28%, with a majority of churn happening around the time of recertification or deadline to submit an interim report.<sup>2</sup> In California, 22% of applications for CalFresh, the state's SNAP program, are from clients who had been enrolled in the program in the previous 90 days.<sup>3</sup>

Most of SNAP churn happens to people who are still eligible, but occurs for procedural reasons such as not responding to a notice by the deadline, confusion about what documents to submit, and missed interviews. Reasons for these issues are plentiful. For instance, notices are sent through postal mail and agencies may not have clients' current addresses; notices may use legal language confusing to most readers; and clients may have difficulty obtaining, printing, and submitting documents to verify their current income and household size. Yet a lapse in benefits can have an immediate impact on clients' food security and a ripple effect to other aspects of their lives, including housing insecurity and financial hardship.<sup>4</sup>

For state or local agencies, churn adds administrative burden for field staff—the average application takes caseworkers two to three times more time than a recertification. It also costs agencies an additional \$80 per household, which can add up to millions of dollars annually, and accounts for \$2.2 million (in Idaho) to \$108.2 million (in Florida) in forgone benefits.<sup>5</sup>

Text messaging provides an opportune channel to communicate directly with SNAP clients to support them through the recertification process. It's fast—clients receive the messages immediately—and inexpensive—costing one cent or less per text. As an increasingly common form of communication, text messaging can reach a large proportion of clients—according to data from Pew Research, 97% of U.S. adults with incomes below \$30,000 own a cellphone.<sup>6</sup> It reduces concerns about having up-to-date client mailing addresses. And depending on the approach you take, it can be relatively easy technology to stand up and maintain. Ultimately, agencies that supplement mailed recertification notices with text messaging are taking an additional opportunity to communicate well with their clients about time-sensitive, important deadlines.

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1. Mills, G., Vericker, T., Koball, H., Lippold, K., Wheaton, L., Elkin, S. (2014). Understanding the Rates, Causes, and Costs of Churning in the Supplemental Nutrition Assistance Program (SNAP) - Final Report. Prepared by Urban Institute for the U.S. Department of Agriculture, Food and Nutrition Service. <https://www.fns.usda.gov/snap/understanding-rates-causes-andcosts-churning-supplemental-nutrition-assistance-program-snap>

2. Mills, G., Vericker, T., Koball, H., et al. (2014).

3. Rosenbaum, D. (2015). Lessons Churned: Measuring the Impact of Churn in Health and Human Services Programs on Participants and State and Local Agencies. Center on Budget and Policy Priorities. <https://www.cbpp.org/research/lessons-churned-measuring-the-impact-of-churn-in-health-and-human-services-programs-on>

4. Mills, G., Vericker, T., Koball, H., et al. (2014).

5. Mills, G., Vericker, T., Koball, H., et al. (2014).

6. Pew Research Center. (2021). Mobile Fact Sheet. <https://www.pewresearch.org/internet/fact-sheet/mobile/>

To reduce churn, Benefits Data Trust (BDT) partnered with the New York City Department of Social Services and Robin Hood to engage in a low-cost strategy to help SNAP recipients in New York City successfully complete the annual recertification process required to stay on the benefit. The strategy sends targeted text messages to “nudge” recipients at the right time, with the right information, to help them through the recertification process. BDT also received funding from a [USDA SNAP Process and Technology Improvement Grant](#) to support this pilot. Since it was launched in 2017, this strategy has helped thousands of New Yorkers successfully recertify, and it has done it at one-third the normal cost of helping them re-apply after losing SNAP.<sup>7</sup> The NYC pilot served as the foundation of similar efforts that BDT is launching with additional states.

“Using text messaging to help clients complete timely SNAP recertifications is an effective, low-cost tool to increase overall recertification rates. We partnered with Benefits Data Trust in 2017 to pilot text message reminders about completing steps for SNAP recertification, and found that this intervention drives significant engagement and ultimately helps households complete the recertification process. We plan to adopt this outreach method in the near future to help more eligible households stay enrolled in SNAP.”

**LIZ LAUROS**

DEPUTY COMMISSIONER, STRATEGIC PARTNERSHIPS,  
NYC DEPARTMENT OF SOCIAL SERVICES

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7. Lauko, R. (2018). Nudging Benefits Access in the Right Direction. Benefits Data Trust. <https://bdtrust.org/nudgingbenefits-access-in-the-right-direction/>

## **Text messaging programs can benefit clients, field staff, and government agencies by:**

### Helping **clients** to

- + Receive timely notifications about renewal deadlines, interview dates, documentation needed, case status changes, and other key information
- + Navigate the renewal process, including understanding the steps they need to take and accessing help when they have questions
- + Submit forms in (what's likely to be) easier and faster ways, such as on a smartphone or computer
- + Complete renewals accurately and on time
- + Keep their SNAP benefits without interruption

### Supporting **field staff** to

- + Resolve discrepancies or issues as they are processing a client's forms or documentation
- + Reduce call center volume by resolving questions and providing information that can easily be communicated over text
- + Free up field staff time to focus on more complex cases
- + Improve accuracy of forms and documentation provided by clients
- + Provide an additional layer of communication beyond mail notifications, which can get lost in the mail, be confusing, get overlooked, or be less actionable
- + Smooth spikes in caseloads around recertification deadlines

### Assisting **state/local benefit agencies** to

- + Reduce SNAP churn and related costs
- + Improve accuracy of benefit allotments
- + Improve compliance with SNAP policies



## Other Use Cases for Text Messaging

In addition to reducing churn around SNAP recertification, text messaging can be leveraged to:

**Improve recertification rates for other benefit programs.** The state of Louisiana, in partnership with Code for America, uses a text messaging program called LA'MESSAGE to send clients recertification reminders for SNAP, WIC, Medicaid, and TANF.<sup>8</sup>

**Send reminders about appointments and document submissions for SNAP and other benefit programs.** LA'MESSAGE also sends texts to benefits applicants to remind them about upcoming required appointments and document submission deadlines.<sup>9</sup> Denver County, Colorado, leverages texting to help families maintain Colorado Works benefits by reminding them of appointments, deadlines, and paperwork.<sup>10</sup>

**Increase benefits participation by targeting Americans who are eligible (or likely eligible) based on cross-enrollment in another program.** Colorado, Massachusetts, Montana, and Virginia, in partnership with BDT, piloted projects that use data matching to identify and send targeted text messages to households likely eligible (based on their enrollment in Medicaid, SNAP, and/or TANF) but not enrolled in WIC.<sup>11</sup>

**Offer information about SNAP benefits and connections to human assistance.** The City of Anchorage's innovation team launched a program that provides answers to residents about the SNAP program, and when needed, connects them with the nonprofit Food Bank of Alaska for personalized assistance.<sup>12</sup> Interested in learning more? Check out the Beeck Center's Social Safety Net Benefits Living Report for more examples and insights on texting outreach.

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8. Code for America. (2019). LA'MESSAGE. <https://www.codeforamerica.org/features/louisiana-demo/>

9. Code for America. (2019).

10. Colorado Blueprint to End Hunger. (2020). <https://static1.squarespace.com/static/5f5a576d6deec24c3172c98e/t/61201498ea0058538645b546/1629492377251/Automated+Messaging+Programs+11-18-20.pdf> and <https://www.endhungerco.org/food-program-marketing>

11. Maneely, J., Nueberger, Z. (2021). Targeted Text Message Outreach Can Increase WIC Enrollment, Pilots Show. Center on Budget and Policy Priorities and BDT. <https://bdtrust.org/cbpp-bdt-wic-texting-guide.pdf>

12. Paynter, B. (2019). This New Program Lets People Text to Access Government Food Aid. Fast Company. <https://www.fastcompany.com/90403496/this-new-program-lets-people-text-to-access-government-food-aid>





# Planning a text messaging outreach program to reduce SNAP churn

One in five SNAP clients loses their benefits when the time for recertification comes — but not because they are no longer eligible. Rather, various procedural hurdles can prevent clients from completing recertification obligations.



**“Legalese”** in the notice might create confusion about a deadline or requirement.



**A change in living situation** might mean the client never receives recertification notices or requirements.



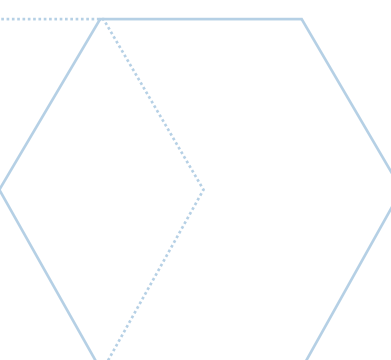
**Lack of access** to a printer might prevent clients from filling out and submitting mandatory documents.

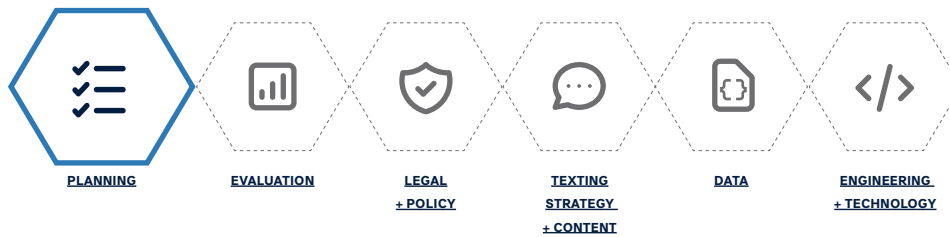


**Unreliable or unaffordable transportation** might cause a missed caseworker meeting.

If you work in social safety net administration, you already know how a lapse in benefits can harm clients and their households. You also know the havoc churn wreaks on your organization’s workflow — a new application takes caseworkers two to three times more time to process than a recertification, on average.

You may even know that text messaging SNAP clients is a proven tactic to increase the rate of successful recertification. But where to begin? Reading this guide will help you with the first steps.



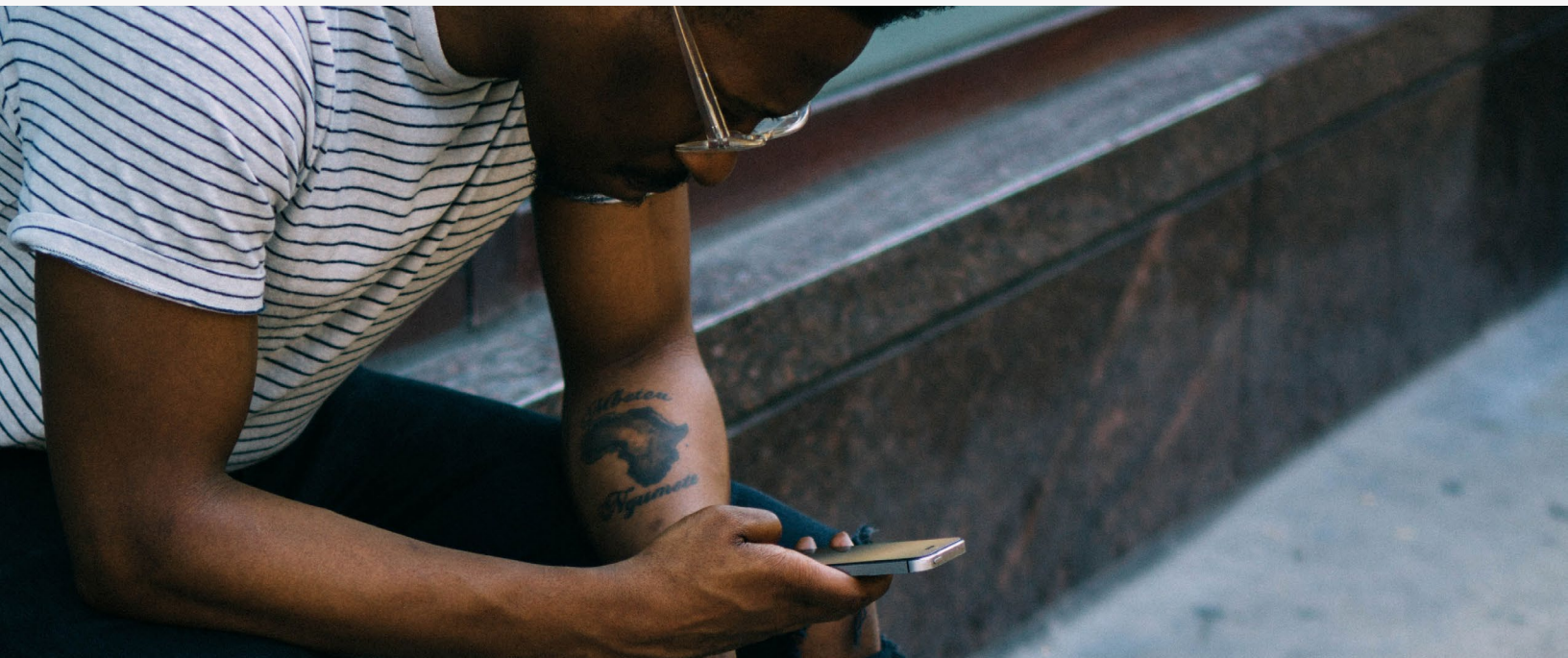


Click on any of the links in this graphic to view or download a standalone guide for that workstream.



### In this section you'll find:

- + [Indicators and methodology](#) for determining how much churn your organization has and why
- + Guidance for [setting objectives](#) for your text messaging program
- + [Roles, skill sets, and FTE equivalents](#) you'll need on your project team from the outset
- + Advice on [mapping workstreams and creating a project plan](#)
- + [Early decision points](#) for you and your team



## Understand How Fixing SNAP Churn Can Help Your Agency Achieve Its Goals

When deciding whether and how to begin using text messaging to support clients with SNAP recertification, one of the first steps is to gain a thorough understanding of churn in your state or locale. By understanding how churn affects clients, field staff, and your agency, you can plan a text messaging program that can help your agency meet its goals.

Conducting this initial assessment means working closely with field staff and other agency stakeholders, so it's important to understand your colleagues' thoughts and any concerns they may have about adding text messaging to lessen churn. Socializing the rationale that's explained in the [introduction](#) of this guidebook may help you gain buy-in for assessment activities.

### Get the Numbers

If your reports don't already include churn rates, spend time working with a data analyst to understand what percentage of SNAP enrollment applications are from clients who had participated in SNAP in the previous 90 days.<sup>1</sup> The more that you can use the information you have to understand churn rates over time, across geographies (e.g., county, municipality, ZIP code, urban, rural, and suburban areas), and between other demographic categories (e.g., preferred language, age, race, and ethnicity), the more informed you will be about which clients are experiencing the highest barriers to recertification.

You may want to focus extra effort to understand if and why unique barriers exist in segments of your client population, and design your text messaging program to help alleviate these barriers.<sup>2</sup>

Also, investigate any available data that indicates why recertification attempts are failing and where clients drop off in the recertification process. Records for clients who experienced churn may include an alphanumeric recertification failure code, and call center staff may categorize calls about recertification failure. Both are valuable data sources. Examine what proportion of clients did not start the process, had recertification form errors, did not submit verification documents, submitted documents that were denied, or did not complete an interview. It's also worthwhile to break this data down by geography and demographic categories. Note if the failure codes indicate any unexpected patterns. This can inform what type of text messaging prompts can be the most effective at reducing churn, and when they should be sent in relation to client deadlines.

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1. Rosenbaum, D. (2015).

2. When client demographic data is accessed safely, securely, and ethically, it allows state agencies and their partners in benefit administration to understand how effective they've been at delivering benefits to underserved communities, and can make adjustments to client outreach and processes in order to advance equity. The Equitable Data Working Group, created by Biden-Harris Executive Order 13985 on "Advancing Racial Equity and Support for Underserved Communities through the Federal Government" has started projects designed to responsibly promote data sharing and matching, as permitted by law, to create datasets needed to answer questions pertaining to equity. Source: U.S. Office of Management and Budget. (2021). Study to Identify Methods to Assess Equity: Report to the President. [https://www.whitehouse.gov/wp-content/uploads/2021/08/OMB-Report-on-E013985-Implementation\\_508-Compliant-Secure-v1.1.pdf](https://www.whitehouse.gov/wp-content/uploads/2021/08/OMB-Report-on-E013985-Implementation_508-Compliant-Secure-v1.1.pdf)



## Collect

Meaningful input and indicators include:

- + Current and past churn rates (% SNAP enrollment applications from clients who participated in SNAP in the previous 90 days)
- + Failure codes assigned to recertification cases
- + Logs/reports from call centers or field staff
- + Additional qualitative data as capacity allows, like field staff surveys and interviews, observations from shadowing field staff, client interviews



## Examine

Make sense of the data by asking:

- + What proportion of churning clients:
  - Did not start the recertification process?
  - Had recertification form errors?
  - Did not submit verification documents?
  - Submitted verification documents that were denied?
  - Did not complete an interview?
- + Are there patterns associated with failure codes, cell center, or field staff logs/reports?
- + Does qualitative data reveal any additional reasons for churn?



## Disaggregate\*

Break results down by:

- + Geography (county, municipality, ZIP code, urban/rural areas)
- + Demographics (preferred language, age, race/ethnicity)

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\*Consult a data scientist, researcher, or evaluator for accurate and ethical methodologies.

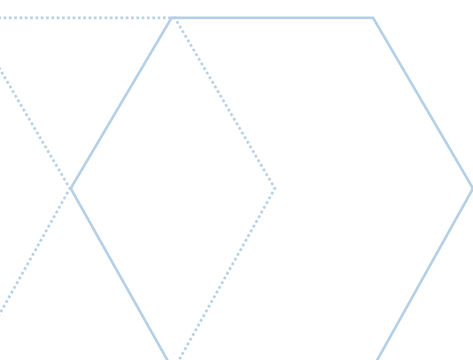
### Talk with Field Staff to Understand Churn Rates and Patterns

Qualitative data can help you understand why your clients churn, what's behind any patterns or differences in rates, and what text messages could be the most effective at reducing churn. You may already have information to examine, like logs or reports from call centers or field staff, which can highlight patterns in the problems that clients describe when they experience churn. You could gather new information from field staff through surveys, attending or reading notes from meetings where staff raise issues, conducting a small number of interviews with field staff, or shadowing field staff as they work with clients. If capacity exists to interview clients who've experienced churn, people who work at community organizations that assist clients in SNAP enrollment and recertification, or both, you may gain rich information, especially if you want to understand why there may be significant differences in churn rates across groups.

Before deciding to shadow field staff or take on client interviews, we recommend reviewing several resources to assure awareness of best practices involving methods, ethics, privacy, recruitment, and compensation. This kind of work is also called user research.

- + [Stakeholder and User Interviews, Contextual Inquiry](#) (for shadowing field staff), [Privacy, Recruiting, and Incentives](#), 18F
- + [Qualitative Research Practice Guide](#), Code for America

If you do not have trained researchers on staff and your interest in these findings is high, vendors (or independent contractors, or research and evaluation firms) can conduct user research. Contracting with vendors that are specifically knowledgeable about SNAP clients and, ideally, one that employs or collaborates with people who have similar lived experiences, is key to success. See the Procurement and Vendor Management section of the [Engineering and Technology guide](#) for important considerations.





## Clarify How Text Messaging Can Help Your Agency Meet Its Goals

Now that you've gained a more thorough understanding of churn in your state, you should set objectives for a text messaging program. These could include:

- + **Reducing the equity gap** in successful recertifications between non-English speaking clients and English-speaking clients, by including alternate language options in text message outreach.
- + **Minimizing burden on field staff**, by increasing the proportion of successful recertifications and reducing the proportion of new applications coming from people who churned off SNAP, saving time to address more complex cases.
- + **Shortening backlogs of client help requests** that come to call centers and other field staff during recertification deadlines, by supporting clients in getting their recertification process started sooner and providing more clarity about the steps they need to take.
- + **Modernizing how clients can submit forms**, by seeing if text messaging increases the rate of recertification forms that are submitted online vs. postal mail.

Refer back to the list in the [introduction](#) of this guidebook for additional suggestions for program objectives. Before setting your objectives, it's worth taking a look at the text messaging approaches that are possible (one-way texting, two-way texting, and variations described in the [Texting Strategy and Content guide](#)) to understand what types of objectives are feasible objectives. For example, can you increase the number of clients who successfully submit recertifications on time by a certain percentage? It may be advisable to wait and see how much of an impact text messaging has when it is first implemented so your targets are more realistic.

By tying your objectives to needs and issues identified by field staff and clients, you can build buy-in for a text messaging program that will address the real issues that affect SNAP recertification in your state or locale. These objectives can make a strong case to your stakeholders for resourcing and for collaboration from your colleagues in other departments and agencies. Include rates, cost-benefit estimates, and quotes from your quantitative and qualitative assessments.

The objectives will also be used to shape your evaluation plan and identify the data you will need to conduct text messaging. See the [Evaluation guide](#) and the [Data guide](#) for more detail.

## Gather Your Team, Resources, and Stakeholders

Every team that takes on a text messaging program will be different. What's important is to bring workstream leads and subject matter experts to the table early on during the planning process so your team can make informed decisions. For a list of decisions that are important to make early for a text messaging program, and options your team can consider, see the [“Early Decision Points”](#) content later in this guide.

As you review this list of needed roles and expertise, remember that some people can contribute in multiple ways, and that some roles and expertise may be shared by more than one person. For instance, an executive sponsor may also manage some partner relationships, or you may have multiple people involved in creating data pipelines.

### **Project manager**

Estimated time commitment\*  
75-100%



Though a successful text messaging program requires the expertise of many people, the project manager is considered the project “owner”—the one responsible for making sure the project is being conducted in alignment with agency objectives and is moving forward. This person is the primary point of contact for the project and will know the status of its multiple workstreams.

### **Software developers**

Estimated time commitment  
30%



One or more people who can build and maintain the infrastructure for the texting platform and data pipeline, and are trained in data privacy and security best practices.

### **Content and outreach specialists**

Estimated time commitment  
25%



One or more people who can draft text message content, translate or oversee translation into priority languages, and create the texting engagement plan. It may be useful for this individual to have a background in behavioral science as well as user experience and design. This role may also lead monitoring text message delivery for quality assurance.

### **Data engineers/analysts**

Estimated time commitment  
25%



One or more people who can help build the data pipeline and manage, analyze, and synthesize data.

### **Research and evaluation specialists**

Estimated time commitment  
10-25%



One or more people trained in qualitative and quantitative research methods who can be involved in planning, implementing, and evaluating the program. Sometimes also called a user researcher.

### **Legal counsel**

Estimated time commitment  
5%



Someone familiar with legal precedent and guidelines at the government agency who can be responsible for contracts and data-sharing agreements.

**Partnership liaisons**

Estimated time commitment  
5%



One or more people who manage relationships with external partners and stakeholders, like community organizations, funders, and other government agencies.

**Benefit program specialists**

Estimated time commitment  
5%



One or more people who are deeply familiar with SNAP program enrollment and recertification processes, including the current service delivery model, pain points, and federal, state, and local program priorities.

**Executive sponsor**

Estimated time commitment  
1-5%



Someone in a leadership position within the government agency that oversees SNAP recertification and approves allocating resources to the text messaging program. Ideally an executive sponsor is also a champion, both externally and within the agency, for the need to improve client experience with SNAP recertification and churn reduction.

**Field staff, community-based organizations, and clients**

Estimated time commitment  
1-5%



Include field staff and community organizations that work with clients on SNAP enrollment and recertification as well as clients throughout the stages of project planning, implementation, and evaluation. For suggestions of how to do so, see Talk with Field Staff to Understand Churn Rates, above.

**Policy specialist**

Estimated time commitment  
3%



Someone familiar with the federal, state, and local policy landscape for SNAP benefits.

**Procurement and vendor management specialist**

Estimated time commitment  
1%



Someone responsible for vetting, selecting, and managing vendors, service providers, and subrecipients. It's highly recommended that this person read the advice and review the resources in the Procurement and Vendor Management section of the [Engineering and Technology guide](#), along with the project manager and agency subject matter experts on the service being procured.

If you find you don't have sufficient in-house capacity to fill each of these roles and areas of expertise, you may choose to engage external vendors that can fill in gaps and bring valuable experience from similar work. We recommend reading the Procurement and Vendor Management section of the companion [Engineering and Technology guide](#) to get up-to-date best practices for procurement that lead to more flexibility and better outcomes for government agencies.

\*Represents estimated time spent (Full Time Equivalency, or FTE) contributing to the text messaging program during the period it's in development. These estimates will vary depending on the size and scope of your program.





**Some best practices to keep in mind as you assemble your team include:**

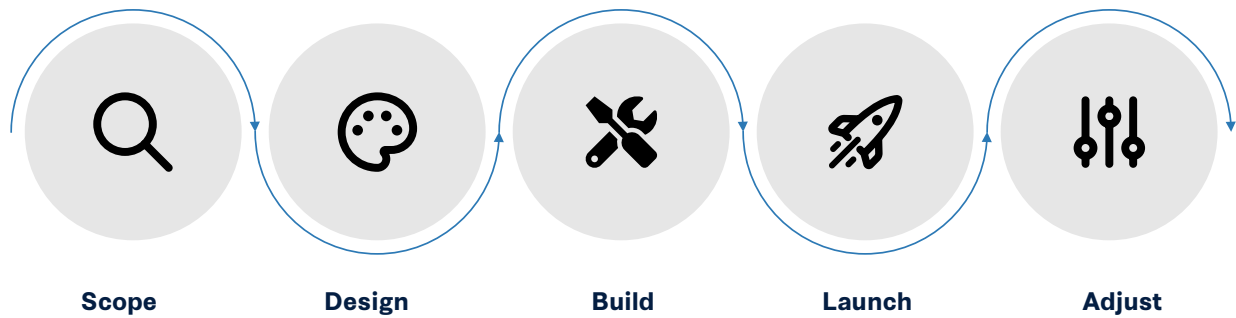
- + Whenever possible, involve people who are familiar with your agency’s systems, protocols, and precedents.
- + Connect with other teams or government agencies that have successfully taken on similar programs to learn from their experiences.
- + Seek out colleagues and partners who may have historical knowledge of previous attempts to engage in client outreach or texting, and understand any sensitivities that may be present from past attempts.
- + Make sure that project workstreams and activities have clear owners, and sufficient support (workforce capacity, time allocation, resources) to achieve their goals.
- + Create opportunities for ideation, sharing best practices, troubleshooting, consensus building, and project check-ins as a full, cross-functional team from the outset.
- + Make sure reporting structures and decision-making authority are transparent to ensure people understand their roles and responsibilities in relation to others.
- + Train teams in diversity, equity, and inclusion frameworks so that equity is integrated into all parts of the program. Many tools exist to support government agencies in this, such as the Local and Regional Government Alliance on Race & Equity’s Racial Equity Toolkit: An Opportunity to Operationalize Equity, which provides a structure to consider equity enablers and risks when implementing a policy or program.<sup>3</sup>

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<sup>3</sup> Nelson, J., Brooks, L. (2015). Racial Equity Toolkit: An Opportunity to Operationalize Equity. Local and Regional Government Alliance on Race & Equity. <https://www.racialequityalliance.org/resources/racial-equity-toolkit-opportunity-operationalize-equity/>

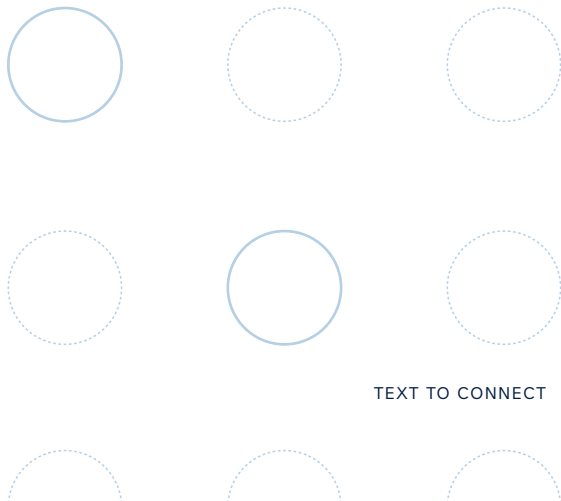
## Map Workstream Activities

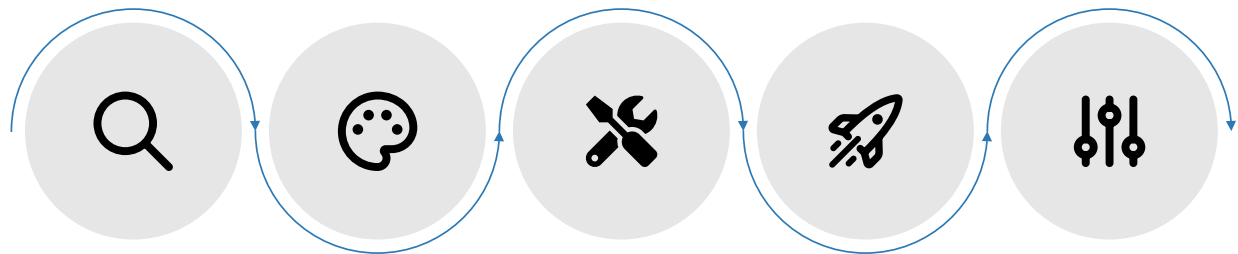
Project lifecycles pass through the following five iterative phases: scope, design, build, launch, and adjust.



Each of the core workstreams involved in developing and implementing a text messaging program—namely, planning, evaluation, legal and policy, texting strategy and content, data, and engineering and technology—are involved in one or more of these phases. The planning workstream is part of the scope phase, as is the legal and policy workstream. The evaluation workstream is most active during the scope, build, and adjust phases. The texting strategy and content, data, and engineering and technology workstreams have activities throughout all phases of the project.

On the next page is a roadmap to help you visualize the major activities happening across the project lifecycle. Scope and design activities—which are the focus of this guidebook—are color-coded by workstream (see key). Some scoping activities are relevant for multiple workstreams (e.g., map resources and identify needs, and conduct analysis of processes, policies, and regulations). For these, we’ve used a grey box with a strip of colors on the left to indicate the relevant workstreams that actively participate in the activity.





**Scope**

**Design**

**Build**

**Launch**

**Adjust**

<p>Conduct scoping research to identify client, case worker, and agency needs</p>	<p>Design and user test texting engagement plan</p>	<p>Prototype, build, and test data pipeline (if needed)</p>	<p>Train field staff on the new texting program and their role in implementation (if needed)</p>	<p>Use qualitative and quantitative methods (including analytics data) to monitor and evaluate program implementation and impact</p>
<p>Define program goals and priorities</p>	<p>Define data set and data pipeline specifications (if needed)</p>	<p>Prototype, build, and test texting platform and other tech components</p>	<p>Launch text messages</p>	<p>Adjust and scale technology to continuously improve program impact</p>
<p>Map resources (workforce, data, technology) and identify needs</p>	<p>Execute data sharing agreement (if needed)</p>	<p>Incorporate texting engagement plan into text messaging platform</p>	<p>Continuously receive client data and maintain data pipeline (if needed)</p>	<p>Adjust and scale technology to continuously improve program impact</p>
<p>Assemble your team</p>	<p>Establish technical specifications for text messaging platform and other tech components</p>	<p>Pilot text messages</p>		
<p>Develop your project plan</p>	<p>Procure technology components (if needed)</p>			
<p>Secure stakeholder buy-in, funding, and vendor contracts (if needed)</p>				
<p>Define outcome metrics and develop evaluation plan</p>				
<p>Conduct analysis of processes, policies, and regulations</p>				
<p>Obtain client consent</p>				

- Planning
- Evaluation
- Legal + Policy
- Texting Strategy + Content
- Data
- Engineering + Technology
- Multiple Workstreams



Each section will walk you through the major scope and design activities for each of the core workstreams. We encourage you and your teams to use each of the workstream sections as you move through project scoping and design. Doing so will ensure you set yourselves up for success for building, launching, and adjusting your program down the line.

## Create a Project Plan

As the team gathers and begins to make early decisions about your text messaging program, you'll want to begin drafting a project plan to organize major steps across workstreams. Read the next sections of this guidebook to learn what major activities happen in each workstream, and note where decisions and actions need to be coordinated—for example, if data needs to be collected for program evaluation purposes prior to deploying a first round of text messaging. Also pay close attention to the length of time each workstream requires; for example, if you plan to share data with a vendor to conduct text outreach, expect that the creation of a data sharing agreement and the legal review involved may take weeks or months.

One tool used to plan coordination across workstreams is a swimlane diagram, which uses horizontal rows (swim lanes) to represent a particular person, team, or organization. A workstream is represented with a flowchart that moves from lane to lane as a particular person, team, or organization takes action on it.<sup>4</sup> For a visual example of a swimlane diagram, see the [Data guide](#) where one is used to demonstrate the cadence of data transfers in a text messaging program. Multiple workstreams can be represented in the same diagram for group awareness of actions to coordinate, though as the project progresses, teams may want to make more detailed diagrams that focus on a particular part of the process.

We encourage you to create a project plan that allows for flexibility and iteration, whether that's driven by feedback from clients and field staff or unexpected technical issues. Ultimately, you will serve your clients better if you build in the capacity to measure the effectiveness of your text messaging program at regular intervals and adapt if course corrections are necessary. For more on this practice, which is part of Agile methodology, see the [18F Agile based project approach](#), published by the U.S. General Services Administration.<sup>5</sup>

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4. Lucidchart. What is a Swimlane Diagram. (Accessed 8/26/21). [https://www.lucidchart.com/pages/tutorial/swim\\_lane\\_diagram/#section\\_0](https://www.lucidchart.com/pages/tutorial/swim_lane_diagram/#section_0)

5. 18F. Agile Principles and 18F Practices: 18F Agile Based Project Approach. (Accessed 8/26/21). <https://agile.18f.gov/18f-agile-approach/>

## Early Decision Points

### Working In-House and with Vendors

These decision points are needed early to allocate government agency and vendor resources, go through procurement processes, and allow sufficient time to create data sharing agreements that undergo legal review. Learn more about these options in the [Engineering and Technology guide](#).

	What It Does	Works Well When	Considerations
<b>Government agency conducts all workstreams in-house</b>	All activities are conducted by in-house staff.	Government agency has high technical capacity that includes Agile methodology experience, and staff with various expertise have collaborated successfully on efforts in the past.	Procurement process is not necessary and data sharing agreements may be limited or unnecessary.
<b>Government agency contracts with vendor(s) for specific workstreams</b>	Vendor(s) fill gaps in government agency capacity and bring valuable experience from similar work.	Government agency has capacity to do some but not all activities, and vendor services are specific to one or several activities like client interviews, user research, developing and delivering text messages, or engineering.	Follow best practices for Procurement and Vendor Management in the <a href="#">Engineering and Technology guide</a> . Allow time for procurement and legal review of data sharing agreements.
<b>Government agency contracts with vendor(s) for most workstreams</b>	Government staff and program subject matter experts partner closely with vendor(s) that bring valuable experience from similar work.	Government staff can fulfill some roles, (e.g., project manager, executive sponsor, legal counsel, benefit program specialists) but need substantial guidance and additional capacity to undertake text messaging program.	Follow best practices for Procurement and Vendor Management. Allow time for procurement and legal review of data sharing agreements.

## Text Messaging Approach

These decision points are needed early to allocate government agency and vendor resources, plan evaluation, make data requests, and prepare field staff. Learn more about these options in the [Texting Strategy and Content guide](#).

	What It Does	Works Well When	Considerations
<b>One-way automated messaging</b>	Your text messaging program sends clients information, reminders, or status updates about their SNAP recertification.	Your program does not have capacity to set up, test, and maintain branching logic within text messages.	Clients cannot transmit responses or questions through text. Clients must rely on other avenues (e.g., call center, field office) for personalized assistance.
<b>Two-way automated messaging</b>	Your text messaging program invites clients to respond to texts to get automated support for common questions or information and updates about their case status, due dates, verification documents received or needed, etc.	Your program has capacity to set up, test, and maintain branching logic within text messages, but capacity for personalized field staff support is limited.	Allows clients to reply over text to choose support options or update case status, meaning they will receive more timely and detailed guidance by text. Clients must use other avenues (e.g., call center, field office) to get personalized assistance.
<b>Two-way messaging with field staff</b>	Your text messaging program provides personalized, one-on-one support to clients from field staff over text, in addition to the features of two-way automated messaging.	Capacity of field staff and technology team is sufficient to provide support to clients over text.	Field staff should be bought in on providing guidance over text and heavily involved in creating/vetting procedures for responding to clients.
<b>Text-enabled document uploads</b> (Add onto two-way messaging)	Your text messaging program lets clients take photographs of verification documents or forms and securely upload them to a case management system or directly to field staff.	Capacity of field staff and technology team is sufficient to provide support for secure document uploads.	Must work with legal, policy, data, and technology teams to assure document transmission complies with privacy and security regulations.
<b>Text-enabled interview scheduling</b> (Add onto two-way messaging)	Your text messaging program prompts clients to schedule any required interviews over text.	Capacity of field staff and technology team is sufficient to provide support for text-based interview scheduling.	Must interface without time lag with interview scheduling systems already in place.

## Using Control Groups, Subgroups, and Pilots

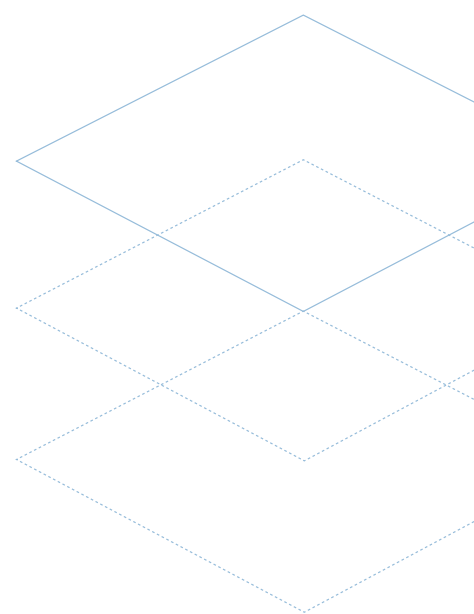
These decision points are needed early to allocate government agency and vendor resources, plan evaluation, make data requests, and build the texting engagement plan. Learn more about these options in the [Evaluation guide](#).

	What It Does	Works Well When	Considerations
<b>No control groups</b>	All clients due for SNAP recertification get sent texts.	There is unusual urgency to recertify clients, a surge in recertifications expected that exceed staff capacity. There is little to no evaluation capacity available, or there are technical barriers to sending some clients, but not all, texts.	The text messaging program can not be said, with certainty, to be correlated with a change in the rate of timely recertifications, because rate change could be due to other factors.
<b>Presence of a control group</b>	For a designated period of time, one group of clients gets text messages, but those in the control group do not.	Evaluation and technical capacity is sufficient. Clients can be separated into groups in a way that they are roughly the same in geographic and demographic characteristics.	Clients who get texts and clients in the control group still receive current correspondence about the need to recertify (e.g., a mailed letter).
<b>Control group, plus subgroups among clients who receive texts</b>	Among the clients receiving texts, there are subgroups of clients who receive different content in texts, and/ or number of text messages.	There's interest in testing what messaging content and frequency works best for clients in the service region. Evaluation and technical capacity is sufficient. Clients can be separated into groups in a way that they are roughly the same in geographic and demographic characteristics.	May require that more clients receive texts overall in order to evaluate response among subgroups.
<b>Pilot text messaging in smaller number of counties (with or without a control group, or subgroups among clients who receive texts)</b>	Clients in specific counties receive text messages, and clients in other counties do not.	There's interest in adopting text messaging at a smaller scale than statewide. State's SNAP operating structure allows for different counties to pilot outreach. Evaluation and technical capacity is sufficient. Technical systems allow for county level text delivery.	Any initial issues with text delivery could be worked through while affecting a smaller number of clients. While counties may not have similar geographic or demographic makeup, good results could lead to wider scale adoption in more counties or statewide.

## Offering Texts in Multiple Languages

These decision points are needed early to allocate government agency and vendor resources, plan evaluation, make data requests, and build the texting engagement plan. Learn more about these options in the [Texting Strategy and Content guide](#).

	What It Does	Works Well When	Considerations
<b>English only</b>	Only sends texts written in English, guidance (phone number, website) provided where additional languages are available.	Client population is overwhelmingly English-speaking and few have limited English proficiency. Using one-way automated texting and data is not yet available in clients' preferred language.	Data about rates of other preferred languages and limited English proficiency may not be available or under counted.
<b>Two or more languages offered for texts</b>	Offers clients a language selection when text is sent. May send text in the client's preferred language if that information has already been collected.	Using two-way automated texting, and/or the client provided their preferred language in the application process.	Offering multiple languages to clients over text may reduce equity gaps in recertification rates. Text translation must be done and checked by fluent speakers of the language, not based solely on free translation tools.

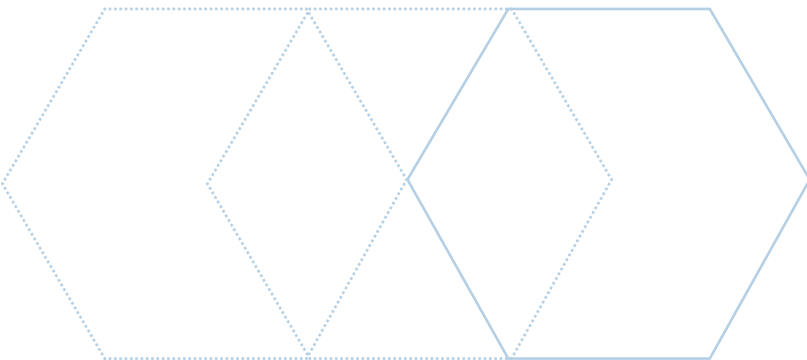




## Opt In or Opt Out

These decision points are needed early to build the texting engagement plan, and ensure agreement with the government agency's legal and policy teams. Learn more about these options in the [Texting Strategy and Content guide](#) and the [Legal and Policy guide](#).

	What It Does	Works Well When	Considerations
<b>Clients confirm they want to opt in to text messages after giving initial consent to receive them</b>	First text to clients asks them to opt in to receiving future texts. By default, clients will not receive subsequent texts unless they engage and opt in.	Either approach works, choice may depend on state or local regulations, and government agency and telecommunications vendor policy.	Must first obtain direct consent to text individual clients in their SNAP application (or a different permission granting format), with exceptions for state agencies.
<b>Clients are given the opportunity to opt out to text messages after giving initial consent to receive them</b>	First text to clients says the client will receive texts unless they request texts stop. By default, clients will receive subsequent texts unless they engage by opting out.	Either approach works, and choice may depend on state or local regulations, and government agency and telecommunications vendor policy.	Must first obtain direct consent to text individual clients in their SNAP application (or a different permission granting format), with exceptions for state agencies.



### Type of Number Used to Send Texts

These decision points are needed early to allocate government agency and vendor resources, and ensure agreement with the government agency’s legal, policy, and technology teams. Learn more about these options in the [Texting Strategy and Content guide](#).

	What It Does	Works Well When	Considerations
<b>Short code</b>	Sends clients texts from a 5- or 6-digit number.	Your program can build in time to apply for a short code from telecommunication carriers, which can take 8-12 weeks. Government agency has budget to pay for setup fees and annual maintenance costs from a texting platform vendor.	Generally has higher deliverability, throughput, and volume rates than other types of numbers.
<b>Toll-free number</b>	Sends clients texts from a 10-digit number with a 8## prefix.	May take less time to set up, and set up fees and annual costs are much less than short codes. Desire is to send messages through existing voice line numbers (e.g., agency’s customer service hotline).	Verification with texting platforms can delay setup, and delivery and throughput will vary.
<b>Local number or 10-digit long code</b>	Sends clients texts from a local number or 10-digit number.	May take less time to set up, and set up fees and annual costs are much less than short codes. Desire is to send messages through existing voice line numbers (e.g., agency’s customer service hotline).	Chance is higher that the number may be blocked by telecommunication carriers.

### Include Clients' Geographic and Demographic Data

These decision points are needed early to plan evaluation, make data requests, and build the texting engagement plan. Learn more about these options in the [Evaluation guide](#), and [Data guide](#).

	What It Does	Works Well When	Considerations
<b>Include clients' geographic and demographic data in initial churn assessments, and when assessing results during text message delivery</b>	Allows your program to understand if barriers to recertification exist for subsections of clients in your service area, and if text messaging yields different results across geographic areas or demographic groups.	Your program uses this data to understand where recertification rates are better and worse, makes an effort to understand why, and designs the text messaging program to increase equity in successful recertification rates.	Work with researchers, evaluators, data scientists, field staff, and clients to plan how to incorporate client information safely, securely, and ethically into evaluation and delivery.

### Frequency of Data Transfers

These decision points are needed early to allocate government agency and vendor resources, engage with the engineering and data teams about the data pipeline and data transfer cadence, make data requests, build the texting engagement plan, and plan evaluation. Learn more about these options in the [Data guide](#) and the [Engineering and Technology guide](#).

	What It Does	Works Well When	Considerations
<b>Less frequent</b>	Allows your program to send clients texts about recertification, but text content does not change when a client takes action (e.g., completes recertification, submits documents).	Your program plans to send clients a limited number of text messages (e.g., a recertification reminder when the recertification window opens).	Choice depends on capacity to send frequent data updates to texting platform vendors and other characteristics of the system(s) where client data is stored.
<b>More frequent</b>	Allows your program to send clients texts about recertification, and text content changes according to the actions a client takes (e.g., completes recertification, submits documents).	One or more of the text messages your program plans to send clients are reminders sent after the recertification window opens, or subsequent texts about items needed to complete recertification (e.g., client still needs to submit verification documents).	Choice depends on capacity to send frequent data updates to texting platform vendors and other characteristics of the system(s) where client data is stored.

## Texting Platform Architecture

These decision points are needed early to allocate government agency and vendor resources, engage with the engineering team, and plan procurement processes. Learn more about these options in the [Engineering and Technology guide](#).

	What It Does	Works Well When	Considerations
<b>Partnering with a vendor to handle the texting platform</b>	Government agency partners closely with a vendor that takes on most aspects of the texting platform, including building the data pipeline.	Government agency has limited in-house technical capacity, and the vendor procured has prior experience doing this work with government agencies.	Follow best practices in the <a href="#">Engineering and Technology guide</a> . Allow time for procurement and legal review of data sharing agreements.
<b>Procuring an enterprise solution</b>	Government agency procures an enterprise solution for the texting platform and can control it in house. Customization is done by the enterprise organization and can come at a high cost.	Enterprise solutions can be very expensive and complex, and may not be the best solution for most text messaging programs.	Follow best practices in the <a href="#">Engineering and Technology guide</a> . Allow time for procurement and legal review of data sharing agreements.
<b>In-house engineering using an off-the-shelf texting platform</b>	Government agency procures a full featured, hosted texting platform that may have limited capacity for customization.	Government agency plans to run a simple texting program (e.g., one-way automated texts). Government agency's technical capacity is low.	Follow best practices in the <a href="#">Engineering and Technology guide</a> . Allow time for procurement.
<b>In-house engineering using a flexible texting platform</b>	Government agency procures a texting platform or texting API to send and receive text messages to clients, but manages other technology components in-house.	Government agency would like to have a two-way automated texting program with the option to add more customization and capabilities as the program evolves. Government agency has a moderate level of in-house technical capacity.	Follow best practices in the <a href="#">Engineering and Technology guide</a> . Allow time for procurement.
<b>System fully built and maintained in-house</b>	In-house engineers build, integrate, and manage technology components of texting platform.	Government agency has high technical capacity that's experienced in Agile methodology, and your agency's objectives require a high level of customization.	High risk for government agencies with no experience developing and implementing texting platforms.

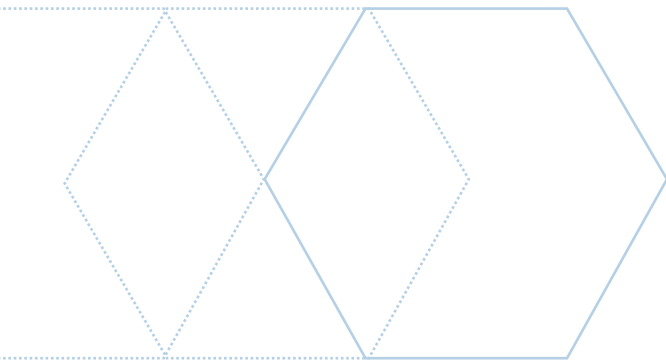


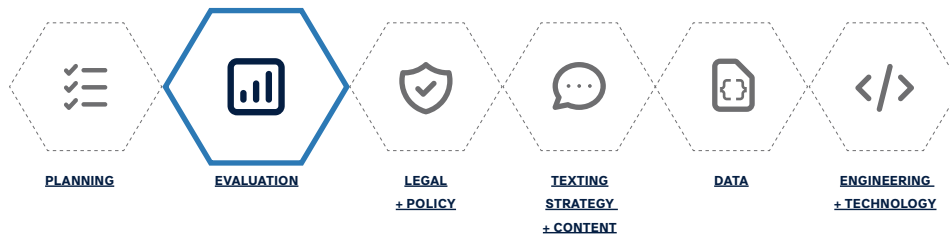
# Evaluation of your text messaging program to reduce SNAP churn

By texting directly with clients about critical deadlines, you will increase the number of those who recertify successfully, boosting the chances of experiencing the security and stability of uninterrupted benefits access, while improving your organization's workflow and efficiency.

Now it's time to design an evaluation plan that will set you up to assess and communicate the impact of your text messaging program. Building evaluation into your program from the onset will pay dividends immediately and in the future. **If you are a research and evaluation specialist, this guide is for you.** Benefits include:

- + **Clarifying** program objectives and identifying gaps
- + **Informing** necessary data sharing agreements and building data exchange pathways before texting starts
- + **Understanding** what elements of your outreach strategy are working for whom and under what conditions, allowing you to make targeted, evidence-based adjustments
- + **Sharing** a compelling story of success to maximize future programming and resource requests





Click on any of the links in this graphic to view or download a standalone guide for that workstream.



**In this section you'll find guidance on:**

- + [Evaluation design](#), including overall structure and questions about controls and comparisons
- + Examples of [evaluation questions](#), with corresponding indicators
- + An appendix with [sample data dashboards](#)



## Evaluation Design

To plan your evaluation, you will want to bring together your evaluation and research specialists, project manager, benefit program specialists, content and outreach specialists, and data team. If possible, representative field staff and clients should be consulted about evaluation content and the ways data will be collected.

Evaluation is a skilled profession,<sup>1</sup> and a trained evaluator or researcher can design an evaluation plan that will let you gain fine-grained insights about the effectiveness of your text messaging program in reducing churn. The evaluation process may also allow you to identify what works generally, which can inform how you might scale your text messaging program.

If your team's capacity to conduct evaluation is limited, at a minimum we encourage your team to:

- + Record the rates of timely recertification before and after texts are sent to clients to note any difference
- + Record how many clients successfully receive and interact with texts shortly after they're sent for quality assurance
- + Conduct simple qualitative evaluation by using some of the methods described in the [Planning guide](#) to consult with field staff about client response, changes to the volume of questions about recertification, and more

A more complete evaluation plan should include:

- + Your agency's objectives for the text messaging program (see the [Planning guide](#))
- + A detailed description of what you hope to learn, including the evaluation questions that you intend to answer during the evaluation process
- + An analysis plan that details what data sources you will need, how you will collect that information, and what types of analysis you will do
  - This includes program outcome and impact measures (e.g., percent increase in rates of timely recertification, percent increase in rates of complete and accurate recertification materials), as well as
  - Implementation and process measures<sup>2</sup> (e.g., text message receipt rate)
- + Details on how you will use the evaluation results

You can leverage a mix of quantitative and qualitative evaluation methods to measure impact. An evaluator, researcher, or data analyst can advise on evaluation design and methods to ensure that you are collecting useful data that will answer your questions.

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1. American Evaluation Association. Values of the American Evaluation Association. (Accessed 8/27/21). <https://www.eval.org/About/About-AEA>

2. You may have heard process measures and process evaluation be called process improvement, continuous improvement, quality improvement, quality assurance, or quality control



## Control Groups

An important and early decision you'll need to make involves whether to include a control group as part of your evaluation, and therefore your text messaging program design. Using a control group, or a group that does not receive text messages during the study period, can help your team determine if the text messaging program is correlated with an increase in recertification/reduction in churn. For example, Benefits Data Trust used control groups in a text messaging program to learn that WIC enrollment increased following text messages to likely eligible families.<sup>3</sup>

Using a control group can strengthen the reliability and validity of your evaluation by providing a counterfactual—essentially, what happens to a near-identical group of clients due for recertification at the same time but who don't receive text messages. If you use a control group, you'll want to make sure you're selecting a group that is as similar as possible to the group of clients that will receive text messages so that you can maximize certainty that any differences in outcomes observed between the groups is indeed due to the text messages, rather than another unobserved variable.<sup>4</sup>

If you test the effectiveness of a text message program while using a control group, all clients due for recertification can still receive the same type of notifications they do currently—for instance, letters sent through postal mail. The only difference would be that the clients who receive text messages now have text messages as an additional source of information.

Some programs decide not to use control groups for good reasons. There may be urgency to get a large number of clients recertified, such as when COVID-19 recertification waivers expire. Agencies may also be limited by staffing and resources to manage a more sophisticated evaluation process and analysis, thus making the use of a control group too complicated. The decision depends on the circumstances of your agency. One alternative to using control groups that might be feasible, depending on your state's operating structure, is to pilot text messaging in one or more counties, while the rest of the state continues receiving the usual recertification notifications. Then, over time, you could expand the text messaging program state-wide.

If you're considering using different text messages or frequency of messages to evaluate what works better, you can read about precedents for that work in the [Texting Strategy and Content guide](#) and in the resources listed in the [Appendix](#).

The following steps offer basic guidance to help your team plan what questions to use to guide your evaluation.

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3. Maneely, J., Neuberger, Z. (2021). Using Data Matching and Targeted Outreach to Enroll Families with Young Children in WIC. Center on Budget and Policy Priorities and Benefits Data Trust. <https://www.cbpp.org/research/food-assistance/usingdata-matching-and-targeted-outreach-to-enroll-families-with-young>

4. For more background on experimental design, see Quantitative Design Strategies and other design methodology resources, or consult with evaluation experts. Source: Begun, A. Research & Statistics for Understanding Social Work Interventions; Module 3 Chapter 2: Quantitative Design Strategies. The Ohio State University College of Social Work; Pressbooks. (Accessed 8/27/21). <https://ohiostate.pressbooks.pub/swk3402/chapter/module-3-chapter-2/>



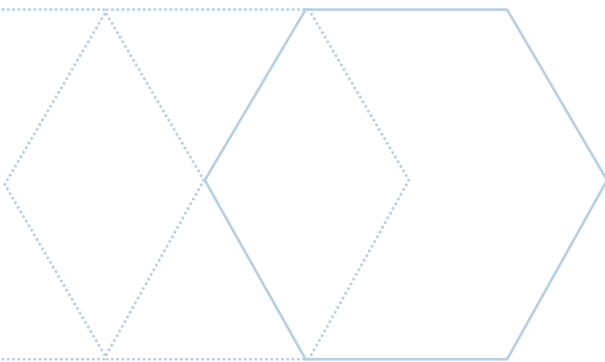
## Evaluation Goals and Questions

Identify the overarching goals of the evaluation, returning to the objectives your agency has for the text messaging program discussed in the [Planning](#) section.

For outcome evaluation, you will consider outcomes and impacts of the text messaging program, like whether the clients who get text messages have different recertification rates than those who don't, or if some geographic or demographic groups have different changes to recertification rates. Outcome evaluation is something that happens at the end of your program cycle, but requires ongoing data collection throughout the entire life of the program. For process evaluation, you will consider the early activities and outputs that show how well the program steps are executed, like measuring if clients actually receive the text messages that get sent to them, and if not, why. Process evaluation is important during initial phases of outreach, especially when beginning a new process. It is very helpful when trying to understand if your approach is working from a technical perspective and is frequently cyclical (if something is not working as planned, tweak and evaluate again to see if there is an improvement). If time dedicated to carrying out evaluation activities is minimal, it is recommended to focus on only a couple of evaluation goals at a time.

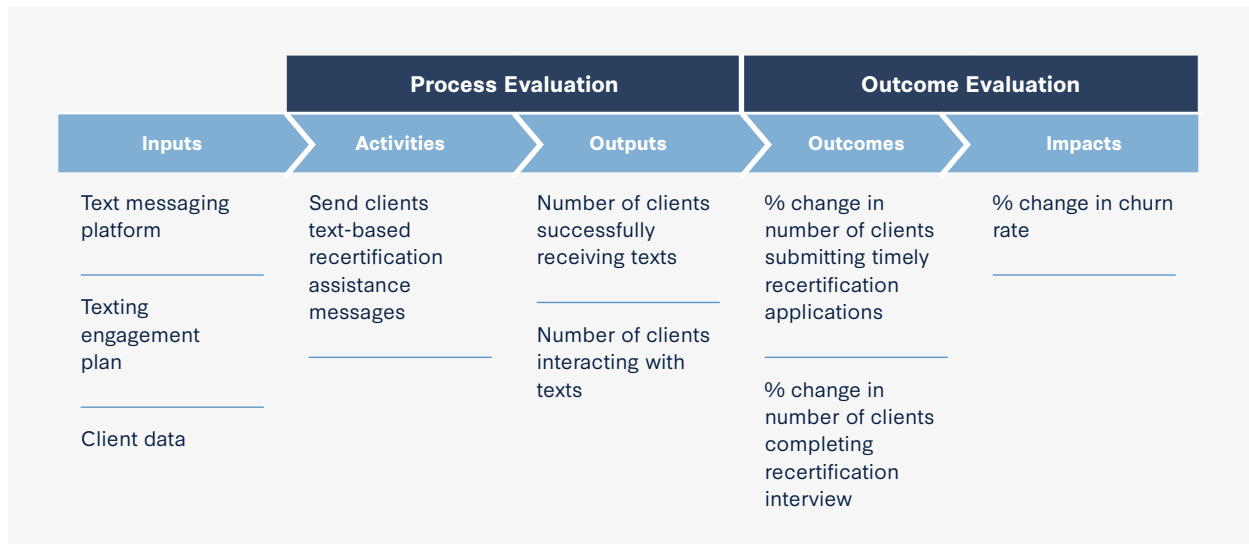
The next step is to identify the **specific questions** you want to answer within the identified goals. These questions can be phrased in a variety of ways, but each question needs a clearly defined way to be measured. Data sources for these questions can include information that is quantitative, qualitative, or both. Once you draft the questions, your evaluation team can decide what methods are most appropriate to answer them.

The following table provides examples of questions and potential approaches to measurement. Be sure to consult with your data team about the feasibility of receiving these measures at the necessary timepoints for evaluation, and that they can be included in any data-sharing agreements. (See the [Data](#) section for more detail.)



Question	Potential Measure
How many SNAP participants are receiving the text messages?	Delivery metrics tracked in text messaging platform
How many and where are participants opting out of messages?	Opt-out metrics tracked in texting platform
Do text messages increase the rate of timely recertifications?	Number of recertifications completed ahead of deadline
Do text messages lead to earlier recertification form submissions?	Median days recertification forms submitted before certification period ends
Do text messages increase the rate of complete and accurate recertifications?	Number of complete and accurate recertification forms and verification returned
Do text messages free up field staff time to focus on more complex cases?	Volume of and reason for call center calls and field office visits, qualitative assessment by field staff
Do text messages improve the recertification experience for clients?	Customer experience survey, qualitative assessment by participants, qualitative assessment by eligibility workers
Do different types of messages lead to differences for any of the measures above?	Above measures tracked for different types of messages
Does the timing of text messages (e.g., time of day or number of days before deadline) lead to differences for any of the measures above?	Above measures broken down by delivery times tracked in texting platform
Are there differences across race/ethnicity, age, or geographic region for any of the measures above?	Above measures broken down by selected demographic variables

Creating a logic model can help you assure that all the evaluation questions you’re asking relate logically to the planned work of your program and your agency’s objectives. A logic model can also demonstrate the rationale for the need to access particular types of data and resources. Here is an example logic model:



For additional information about creating and using logic models, consult with your evaluation team or resources such as the [W.K. Kellogg Foundation Logic Model Development Guide](#) and [Logic Models for Program Design, Implementation, and Evaluation](#).

Similarly, a dashboard can help your evaluation and texting teams track and monitor short term outputs for quality assurance and program outcomes and impacts over time. See the [Appendix](#) for a sample evaluation dashboard. Your data and technology teams may be able to create or source dashboard metrics from an analytics tool as they establish the texting platform; check with them early to see what’s possible. For more information, see the [guide](#) section.



### **Using and Sharing Evaluation Learnings**

The best evaluation is not useful if learnings are not collected and shared. Part of the evaluation planning process should include an assessment of who evaluation findings will be shared with and for what purposes. For example, you may want to:

- + Provide project managers with real-time information on text message delivery rates so any issues can be addressed immediately
- + Report to agency leadership or the public whether the project has improved racial equity in rates of successful recertifications
- + Report to field staff how texting has reduced recertification caseload spikes
- + Report to clients engaged in user testing how their contributions shaped the text messaging program
- + Inform future project decisions and project improvement efforts

Again, refer back to the objectives your agency set out for the text messaging program to inform what findings take priority for particular audiences (see the [Planning](#) section).



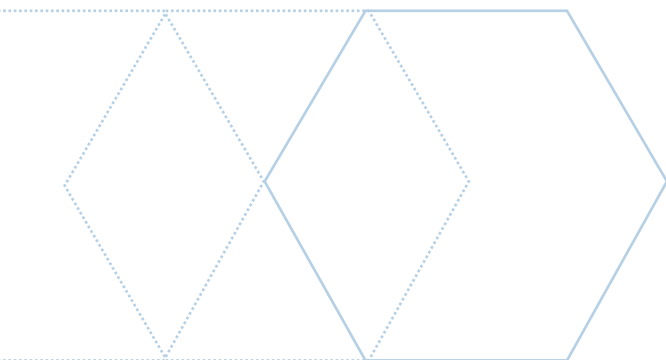
# Legal + Policy considerations for using text message outreach to reduce SNAP churn

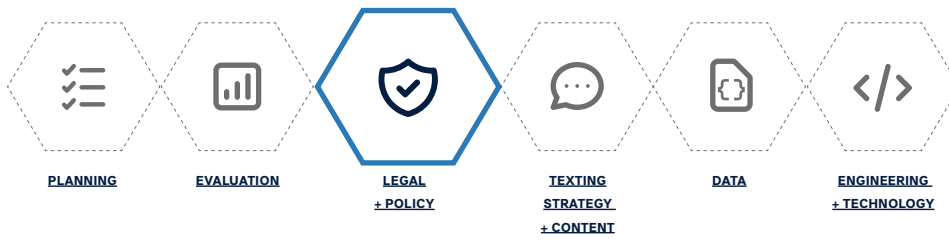
As with any social support strategy, it's imperative to consider legal and policy concerns, especially those that have to do with consent and personally identifiable information.

From a legal and policy standpoint, there are two main areas to consider as you design your program:

1. The legality of **sending** large volumes of text messages, especially when it comes to SMS compliance and rules.
2. **Sharing** client information, especially if a third party or vendor will receive client data in order to send messages.

If you are a lawyer or policy advisor, this guide is intended to provide a general overview of the national statutory and regulatory landscape governing these areas. Note that this does not constitute legal advice. Rather, we hope that this context will jumpstart your analysis so that you can focus on any requirements particular to your jurisdiction. Getting an early and comprehensive understanding of key legal and compliance requirements will ensure that your agency selects the right path forward for your text messaging program.





Click on any of the links in this graphic to view or download a standalone guide for that workstream.



**In this section you'll find legal considerations for:**

- + [Sending text messages](#), including criteria, consent, and best practices
- + [Using and disclosing client SNAP data](#)



## Sending Text Messages

The Telecommunications Consumer Protection Act (TCPA)<sup>1</sup> and the Federal Trade Commission Act (FTCA)<sup>2</sup> are the primary statutes that may apply to a SNAP recertification text messaging program. A program like this is allowable under these laws if it meets all three of these criteria:

1. Messages are for a non-commercial purpose,
2. The individual has a prior relationship with the agency and voluntarily provided their phone number to the agency, and
3. Messages are not being sent via an automatic telephone dialing system.

It should be noted that if a state agency sends the text messages itself, the FCC has ruled the consent requirement of the TCPA does not apply.

A text messaging program that contacts SNAP clients to help them complete the recertification process would generally satisfy the above criteria because:

1. The messages being sent are for informational, not commercial, purposes,
2. Clients voluntarily provided their phone numbers to the government agency (a SNAP application only needs to contain a name, address, and signature to be considered complete so this includes an additional level of data collection), and
3. Messages are being directed to specific known numbers rather than being reached through a system using random or sequential messaging.<sup>3</sup>

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1. Restrictions on the use of telephone equipment, 47 USC § 227 (2018). <https://www.govinfo.gov/app/details/USCODE-2019-title47/USCODE-2019-title47-chap5-subchap1-part1-sec227>

2. Federal Trade Commission established; membership; vacancies; seal, 15 USC § 41 et seq. (2018). <https://www.govinfo.gov/app/details/USCODE-2019-title15/USCODE-2019-title15-chap2-sub-chap1-sec41/summary>

3 Facebook, Inc v. Duguid et al. 592 (U.S. 2021). [https://www.supremecourt.gov/opinions/20pdf/19-511\\_p86b.pdf](https://www.supremecourt.gov/opinions/20pdf/19-511_p86b.pdf)



However, given the significant penalties and reputational harm associated with bad actors, texting platforms (discussed further below) and telecommunication carriers (e.g., Verizon, AT&T, T-Mobile) impose stricter requirements for using their platforms and networks than required by law. To navigate these self-imposed industry restrictions, government or nonprofit entities looking to engage in text messaging programs should consider these recommendations to avoid roadblocks that could include being barred from sending messages:

**Get client consent to send text messages:**

Get direct consent from clients to send them text messages about their SNAP benefits.<sup>4</sup> Add a statement about the text messaging program to SNAP forms (both paper and electronic) with a space for individuals to provide written consent (e.g., check a box on SNAP application form authorizing communications through text message). These measures help you avoid barriers in getting approvals from texting platforms and telecommunication carriers and are general good practice. For more on obtaining client consent, see the [Texting Strategy and Content Guide](#).

The form is titled "Contact Information" and "Communication Preferences". It includes input fields for "Email Address" (example@email.com), "Mobile Number" ((215) 555-1234), and "Home Number Preference" ((215) 555-1234). Under "Communication Preferences", it asks "How would you like to hear from us?" with radio buttons for "Email", "Text", and "U.S. Mail". "Text" is selected. There are checkboxes for "Important case communications" and "Helpful information about benefits", both of which are checked. A small text box at the bottom states: "If you select to receive texts, you agree to these Terms and Conditions. Message and data rates may apply. Message frequency varies. Case communications will be sent from short code 123456 and informational messages will be sent from short code 789012. You may opt out anytime by texting 'STOP' to the short code or get assistance by texting 'HELP'."

+ Sample Communication Preferences Checkbox to Obtain Consent

The message text reads: "We will call, email, or text you notifications regarding the status of your application or any other benefits you may qualify for. Message and data rates may apply. You may opt out of receiving notifications at any time. Would you like to opt out?" Below this are radio buttons for "Yes" and "No", with "No" selected. At the bottom, it asks "What phone number would you like to use to receive notifications?" with a dropdown menu showing "(215) 555-1234".

+ Sample Consent Message with the Option to Opt-Out

4. Courts have held that when an individual knowingly releases their phone number, they have in effect given their invitation or permission to be called at the provided number, and the express consent requirement of the TCPA is met (see *Chisholm v. AFNI, Inc.*, Civil Action No. 15-3625 JBS/JS (U.S. Dist. NJ 2016). <https://casetext.com/case/chisholm-v-afni-inc>). However, for the reasons explained, we strongly recommend getting direct consent from SNAP clients before sending them text messages.





### **Follow message content best practices:**

Telecommunication carriers require the following items in the statement of consent. (See the Consent subsection of the [Texting Strategy and Content Guide](#) for more detail.)

- + Clearly identify the sender and the purpose of the message;
- + Disclose in the first message that message and data rates may apply;
- + State in the first message when the client opted into texts and the planned frequency of how often future messages will be sent; and
- + Provide opt-out instructions in the first message and in subsequent messages that resume contact with the client.

### **Review federal, state, and local regulatory requirements:**

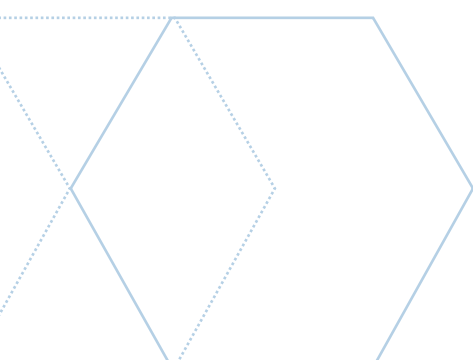
In addition to understanding federal requirements, some states and localities have introduced their own restrictions and compliance requirements on high volume text messaging activities. Reviewing what, if any, additional state- and local-level requirements there might be can help set the project up for success.

### **Choose a vendor set up to work with government agencies:**

The requirements and needs of government (and nonprofit) agencies are typically different from those of commercial entities, which most vendors are set up to accommodate. In the crowded marketplace of texting platforms, some are better set up to work with government agencies. In selecting a vendor, you should evaluate their knowledge of requirements specific to governments and experience working with other government agencies. This goes for vendors of other services involved in your text messaging program as well.

### **Choose the right type of number for the job:**

There are three types of numbers used for text messaging: short codes, toll-free numbers, and local numbers (also called 10-digit-long codes). Each type has unique costs, provisioning (i.e., approval parameters and timelines), allowable uses, and throughput and total volume limits. See [Choosing the Right Type of Number for the Job](#) in the [Texting Strategy and Content Guide](#) for more detail about these options and differences among them.





**Use a service to clean phone lists of non-cell phone numbers:**

Some text message platforms offer this as a service although there may be additional fees associated with it. This should be considered in the procurement process. Ensuring that only cell phones are being sent text messages will reduce the likelihood of triggering spam alerts that can prevent messages from being delivered.

**Do not exceed the throughput volume limit:**

Throughput is the number of messages per second that can be sent. This limit will depend on the type of number being used (see [Choosing the Right Type of Number for the Job in the Texting Strategy and Content Guide](#)) and other factors that are part of the provisioning process. Exceeding authorized limits will trigger spam alerts and potentially lead to being locked out completely by telecommunications providers. Securing a high throughput number or spacing out messages throughout the day can help avoid this.

**Ensure opt-out requests are honored:**

Texting platform software is designed to automatically process opt outs, but you should also ensure that your agency records are updated accordingly so as not to send messages again to those who opt out.

## Using and Disclosing SNAP Client Data

To protect client confidentiality, federal regulations generally restrict use and disclosure of information obtained from SNAP clients. However, there is an exception that allows SNAP participant data to be shared for purposes of SNAP administration.<sup>5</sup> Because notifying households about recertification is a part of SNAP administration,<sup>6</sup> SNAP agencies are permitted to use and share client data to carry out the text messaging program for this purpose. In addition, recertification assistance is noted as allowable under SNAP outreach plan guidance where a SNAP outreach partner is being considered for carrying out the texting messaging program.<sup>7</sup> You should review state and local regulations for the use and disclosure of SNAP data. In BDT's experience, executing SNAP data sharing agreements in many states, state and local laws have not been a barrier.



5. Requirements for Participating State Agencies, 7 CFR 272.1(c)(1)(i) (2021). <https://casetext.com/regulation/code-of-federal-regulations/title-7-agriculture/subtitle-b-regulations-of-the-department-of-agriculture/chapter-ii-food-and-nutrition-service-department-of-agriculture/subchapter-c-supplemental-nutrition-assistance-and-food-distribution-program/part-272-requirements-for-participating-state-agencies/section-2721-general-terms-and-conditions>

6. Certification of Eligible Households, 7 CFR 273.14 (2021). <https://casetext.com/regulation/code-of-federal-regulations/title-7-agriculture/subtitle-b-regulations-of-the-department-of-agriculture/chapter-ii-food-and-nutrition-service-department-of-agriculture/subchapter-c-supplemental-nutrition-assistance-and-food-distribution-program/part-273-certification-of-eligible-households/subpart-e-continuing-participation/section-27314-recertification>

7. USDA Food and Nutrition Service: Outreach. <https://www.fns.usda.gov/snap/outreach>



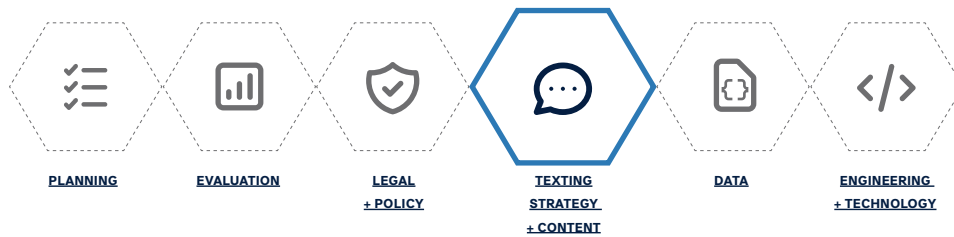
# Strategy + Content for using text message outreach to reduce SNAP churn

This guide is intended to help content and outreach specialists choose a strategy that will work for both your organization and your clients. Inside, you'll find guidance and best practices for crafting messages, engaging clients, and obtaining consent.

Working with your technology partners and internal IT group you'll want to confirm:

- + Should we use a one-way strategy to provide clear and timely reminders?
- + Or should we use a two-way system that provides clients with automated or staff-supported responses for an interactive experience?
- + What will our first text message say?
- + How frequently will we send text messages?





Click on any of the links in this graphic to view or download a standalone guide for that workstream.



### In this section you'll find:

- + Benefits and sample copy for one-way messaging
- + Benefits, sample copy and sequencing for two-way messaging
- + Best practices and sample copy for obtaining consent
- + Guidance for choosing the right phone number to send text messages from
- + Best practices for texting



## One-Way Messaging

One-way automated text messaging is a great way to send SNAP clients reminders about upcoming recertification deadlines, interviews, and verification documents. It can also be used to notify clients about their case status or relay other timely information. The barrier to entry for one-way automated messaging is low because it is relatively simple and inexpensive to set up and maintain, so it can be a good first step when piloting a new text messaging program.

As a best practice, you will want to set up your texting platform to auto-send SNAP clients an initial reminder as soon as their recertification window opens. This ensures they return their form with ample time for sequential steps like completing their interview and submitting verification documents.

You should also prepare a set of follow-up texts to nudge clients who haven't taken action. Timing of these messages should consider the client's options for returning their renewal form. For example, if only a paper form is supported, reminding clients two weeks before their deadline may be too late to complete, send, and process their materials.

Interview and verification reminders can be triggered as clients move through the process, with follow-ups scheduled a couple of days before the interview date and recertification deadline. Keep in mind that these types of messages require insight into where a client is in their recertification process, so you'll need to make sure that your program database has up-to-date information about client case statuses.



It's important to solidify your text messaging approach early because it directly informs your data strategy and technology decisions. Once you've narrowed in on what you're trying to accomplish with the text messaging program and the approach you want to take—one-way automated, two-way automated, or two-way automated with field staff support—you can work on designing and user testing the specific content and mechanics of your texting engagement plan concurrently with other workstreams (such as [building a data pipeline](#) and [setting up a texting platform](#)).



## Sample one-way text messages for SNAP recertification



### Sample recertification reminder

(Start of recertification window or 60 days before deadline)

This is [Agency] letting you know it's time to renew your SNAP benefits. Look out for your form in the mail or submit online at [site]. To end texts reply STOP



### Sample follow-up

(2 weeks before deadline)

Your SNAP renewal is due in 2 weeks. To keep your benefits, go to [site] to submit your form. Need help? Call us at [phone number]. To end texts reply STOP



### Sample interview reminder

(Once form is submitted)

Your SNAP interview is scheduled for [date] at [time]. A case worker will call you at that time. Need to reschedule or have questions? Call [phone number]



### Sample verification reminder

(Once interview is complete)

The last step to renew your SNAP benefits is to submit your documents. You can upload them at [site], mail them to [address], or drop them off at your local SNAP office.

Need help? Call [phone number]. If you've already submitted your documents you can ignore this message.

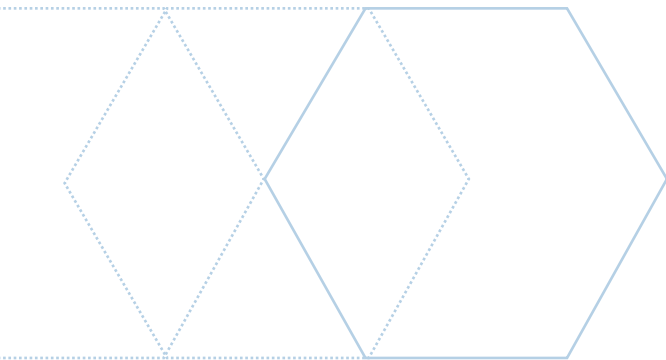
## Two-Way Messaging

Two-way text messaging is great for providing an additional layer of support to clients. While it requires more resources to set up and maintain, the dynamic nature allows you to better serve client needs. Keep in mind that the more interactions and layers you build in, the more time it will take to set up and test.

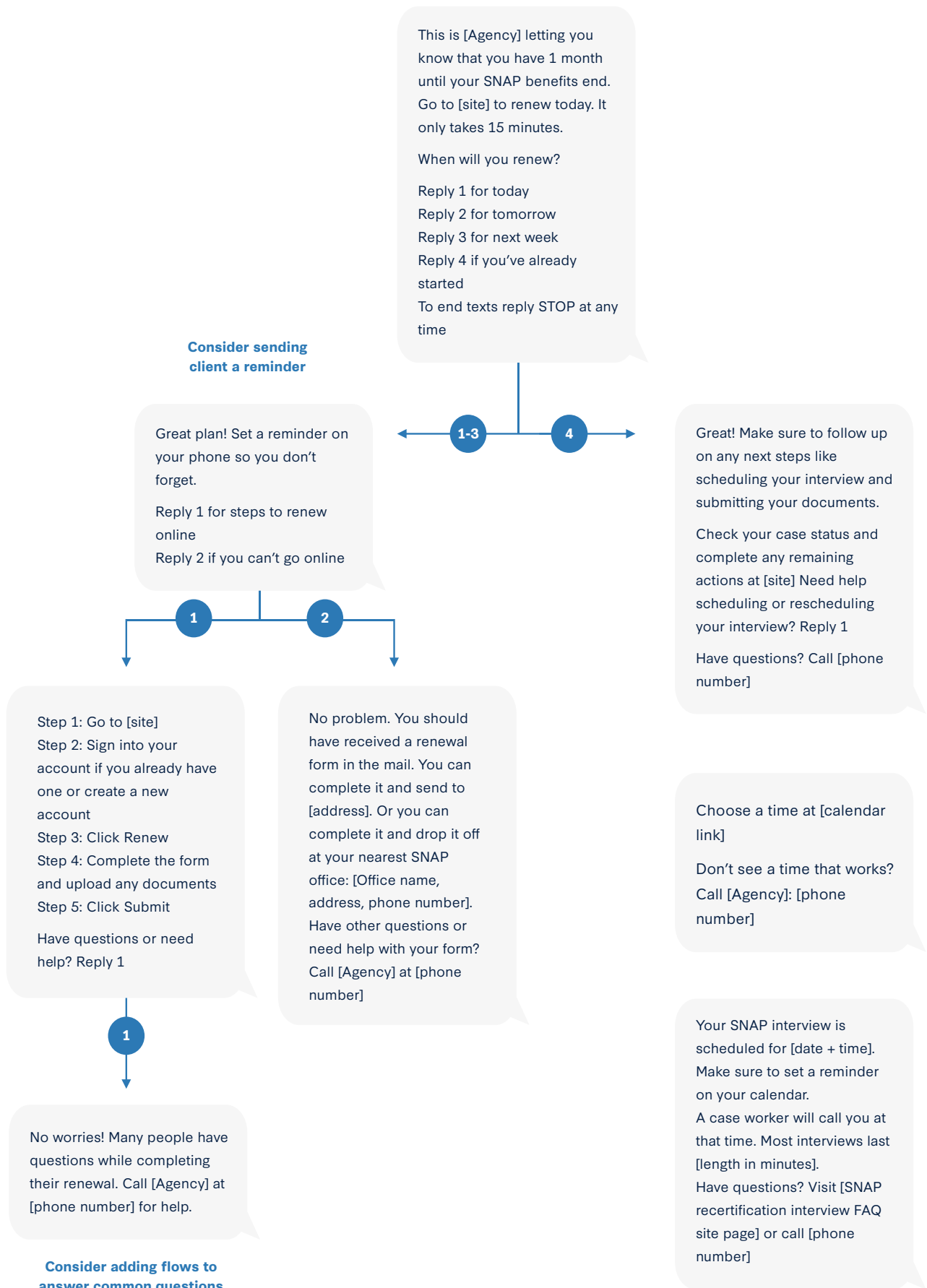
A common use case for two-way messaging is creating an automated flow that answers frequently asked questions and directs clients to resources as they navigate the process. This can help reduce call volume, free up staff time to focus on helping clients with more complex cases, and improve completion and accuracy of documents. Running an automated two-way messaging system will require extra time from content designers and engineering to set up. That said, once it's up and running, maintenance is as lightweight as one-way messaging.

If you have the resources to add a human element, you can create a two-way texting system where field staff provide individualized support to clients in real time. This could include answering complex questions, providing application assistance, or following up with clients about elements of their case as it's being processed.

With additional engineering resources, you could even integrate a way for clients to schedule interviews or submit verification documents over text (possibly by providing a link to a secure, mobile-responsive website where clients can upload documents). Since text messaging itself is not a secure method of communication, make sure you work closely with your legal/policy team and IT security to understand the federal, state, local, and agency regulations around sending and receiving sensitive information over text to ensure you are complying with security and privacy laws.







## Consent

As a legal matter, before you can begin texting clients, you must get their consent. Although if a state agency is sending the text messages itself, the FCC has ruled that the consent requirement of the TCPA does not apply (see the [Legal and Policy guide](#) for more details). Regardless, getting consent is recommended as an ethical best practice. As a matter of law, make sure to review federal, state, and local regulations that affect how you obtain client consent. To conform to federal communication requirements, SNAP agencies should inform clients about the text messaging program and give them the option to opt in via application and recertification forms and during other touchpoints where consent can be documented. Calls and interviews with field staff also provide good opportunities to let clients know about the program and either get their consent or direct them to a sign-up form to opt in.

When obtaining consent, you should:

- + Explain who will send messages
- + State the purpose of messages
- + Inform clients of message frequency
- + Disclose that message and data rates may apply
- + Explain how clients can opt out in the future

Once clients have agreed to participate, a good practice is to send them an introductory text reminding them of the program's purpose with the opportunity to further confirm opting in.





### **Sample introductory message with opportunity to confirm their opt in**

[Agency] is using a text message reminder service to help you keep your benefits. Would you like to receive reminders about the SNAP renewal process?

You will still get mail notices and will receive up to 4 texts per month. Standard messaging and data rates may apply.

Please reply YES or NO. You can opt out at any time.



### **Sample introductory message with additional opportunity to opt out**

[Agency] is working to ensure you keep your SNAP benefits. We will send you important reminders and confirmations to help you complete each step of the renewal process.

Don't want reminders? Reply STOP to end texts.

# Choosing the Right Type of Number for the Job

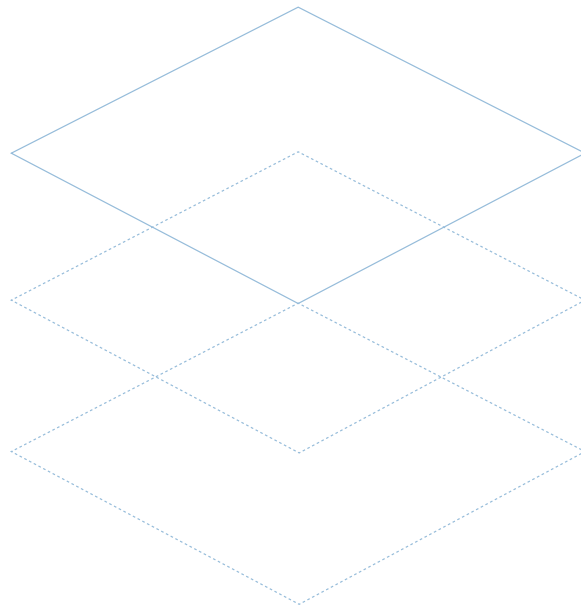
There are three types of numbers that can be used for high volume texting: short codes, toll-free numbers, and local numbers (also called 10-digit long codes).

Below is a breakdown of the different number types. The exact costs, specifications, and other considerations for each type of number will depend on the approved use case (i.e., for what purpose texts will be sent), texting platform vendor, and telecommunication carrier that messages are delivered through (e.g., some carriers will impose stricter limits on volume than others). Therefore, this table is for illustration purposes only. However, per message cost is currently less than \$0.01 for all three types of numbers.

Regardless of which type of number you use, remember to work with your texting platform vendor to ensure the number is registered appropriately (e.g., recognized as belonging to a government entity) to avoid imposition of requirements that are otherwise not applicable.

	Short Code	Toll-Free Number	Local Number or (10-Digit Long Code)
<b>Description</b>	5- or 6-digit number	10-digit number with a 8## prefix	10-digit number with standard area code prefix
<b>Provisioning Time</b>	Weeks-Months	Minutes (but verification through texting platform can take longer)	Minutes (but trust/RISQ score can take longer)
<b>Setup Cost</b> Some platforms do not charge for setup	~\$500-\$1,000	~\$5	~\$5
<b>Maintenance Cost</b>	~\$6,000-\$12,000 annually	~\$5-\$15 annually (but may be more based on vendor and message volume)	~\$2-\$200 annually
<b>Deliverability</b> Likelihood message reaches recipient	High	Moderate (but high if verified through texting platform)	Moderate (depending on trust/RISQ score and carrier)

	Short Code	Toll-Free Number	Local Number or (10-Digit Long Code)
<b>Throughput</b> Low: less than 10 messages per second Medium: Between 10 and 60 messages per second High: More than 60 messages per second	High	Low (but high if verified through texting platform)	Low to high (depending on trust/ RISQ score and carrier)
<b>Total Volume</b>	Unlimited	Unlimited (if verified through texting platform)	Low to high (depending on trust/ RISQ score and carrier)
<b>Can Send Messages Through Existing Voice Line Numbers</b> Such as the agency's customer service hotline	No	Yes	Yes





## Best Practices for Texting

You'll want to design and user test text messages to ensure they are understandable, simple, accessible, appropriate for clients in different circumstances, and are framed in a way that establishes trust and credibility with recipients. Here are some resources that can help (full links are in the Additional Resources section of the [Appendix](#))

- + [Plain Language Guidelines](#): Practical advice on writing clear communications from the U.S. government.
- + [Limited English Proficiency Translation Guides](#): State and federal resources on translation and multilingual communications.
- + [Targeted Text Message Outreach Can Increase WIC Enrollment, Pilots Show](#): On page 14 of this report co-authored by Benefits Data Trust and the Center on Budget and Policy Priorities, you'll find examples of text messages informed by behavioral science. Behavioral nudges<sup>1</sup> are context-dependent, and texting engagement plans should undergo user testing.
- + [LA'MESSAGE Pilot: Text Reminders in Louisiana](#): On page 23 of this report by Code for America, the authors describe user testing text messages with social safety net benefits clients.
- + [Usability Testing](#): Guidance from the federal government for testing a service, like your texting engagement plan, with clients before it's implemented.

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1. For more on the topic of behavioral nudges, see Thaler, R., Sunstein, C. & Balz, J. (2010). Choice Architecture. <https://ssrn.com/abstract=1583509> or <https://www.sas.upenn.edu/~baron/475/choice.architecture.pdf>



Regardless of your texting approach, here is a checklist of best practices to keep in mind:

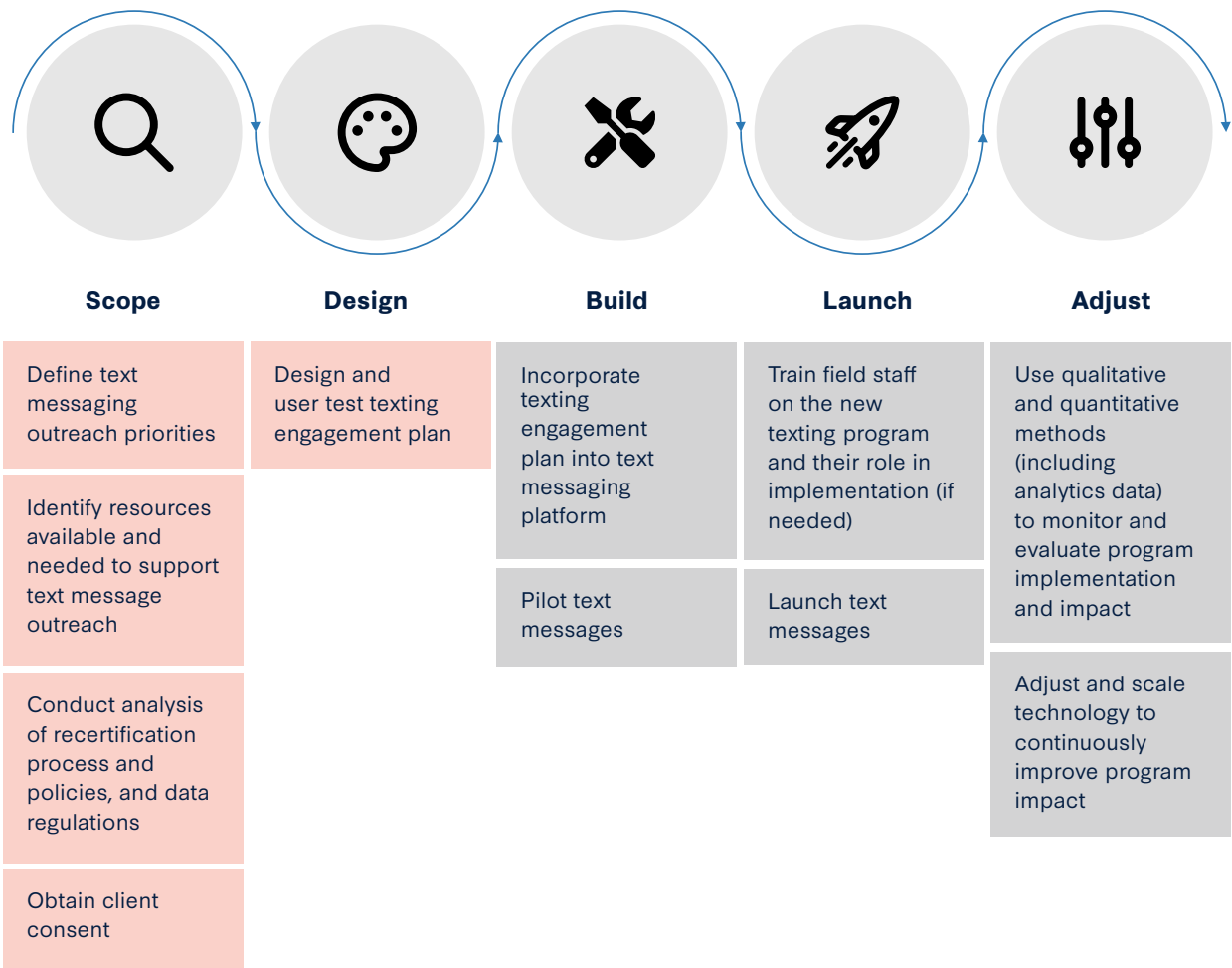
- ✓ Obtain consent before you text clients and give them the ability to opt out of future messages.
- ✓ Send all messages from the same short code or phone number, and make sure that all field staff and community organizations that assist SNAP clients are aware of the text messaging program and have the number, in case clients call with legitimacy concerns. See above for more on using a short code versus a phone number.
- ✓ Establish legitimacy by identifying the agency's name and why you're texting in the initial message. If you're working with a vendor to send messages, the vendor should explain how they are partnering with the agency to avoid potential client confusion from hearing from multiple sources. You could consider providing a hyperlink to a statement from the agency that explains the text messaging program and any vendors involved.
- ✓ Keep hyperlinks short so clients without smartphones can easily type them into a browser. Avoid using public link shorteners like bit.ly and rb.gy, as some carriers block messages containing them as potential spam.
- ✓ For automated text messaging, set up auto-replies to clients who text back, letting them know that replies are not read and referring them to the call center. Set up an automated voice message referring clients who dial the number to the call center.
- ✓ Keep text messages short and to the point, ideally less than 160 characters to ensure they send as one SMS for people without smartphones. Larger messages are split into segments of 153 characters and may be received out of order, so you should not exceed 306 total characters (2 SMS segments). The best way to do this is using an SMS length calculator like TextMagic. This is particularly important for texts in other languages.
- ✓ Use plain language and give clients clear actions with simple decisions. For guidance on plain language see [plainlanguage.gov/guidance/audience](https://www.plainlanguage.gov/guidance/audience). For more on choice architecture, check out this [paper on Choice Architecture](#) by Richard Thaler, Cass Sunstein, and John Balz.

- ✓ Test message framing, timing, and frequency with a small number of clients to maximize impact and iron out potential issues before you launch the program. See Code for America's [LA'Message Pilot report](#) for how iterating messages with clients can improve results.
- ✓ Provide clients with the call center phone number if they have questions or need assistance.
- ✓ Offer translation options for commonly spoken languages and continue messaging clients in their preferred language once established. Better yet, text clients in their preferred language from the outset. See [lep.gov/translation](http://lep.gov/translation) for advice.
- ✓ Make sure text message content and timing align with other notifications and communications clients are receiving about their benefits. Messages requiring action by a deadline, like completing a renewal, should be sent with enough lead time for clients to complete the task.
- ✓ Review federal, state, and local security and privacy regulations about what information can be sent/received via text. To protect client privacy, agencies should omit unnecessary sensitive or personally identifiable information.
- ✓ If possible, connect your texting platform to the case management system or create a way to sync them at frequent intervals so that field staff can see what texts clients have received/responded to and verify the texting platform is sending clients relevant texts.



## Texting Strategy + Content Roadmap

Below is a snapshot of what's involved in the texting strategy and content workstream over the project lifecycle. In orange are key scope and design activities for defining your texting approach and texting engagement plan.

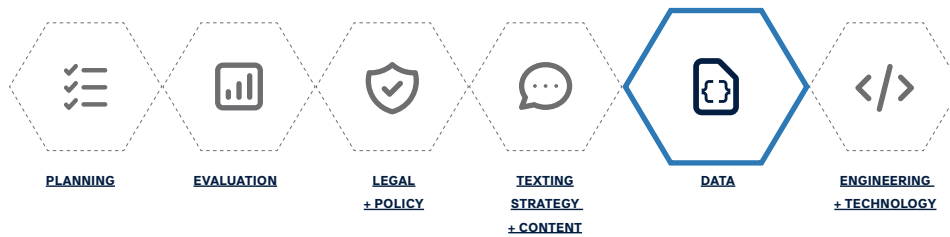




# Data collection considerations for using text message outreach to reduce SNAP churn

Securing your data and ensuring client privacy are imperative. This is why – once you’ve identified your objectives, designed and established your evaluation plan, and started considering your texting strategy – you’ll need to identify and secure the data to support your text messaging program. It can take time to understand what specific data you need, access it, and initiate file transfers, so it’s important to start this workstream as early as possible. This guide is intended to help data engineers and analysts build the data pipeline and manage, analyze, and synthesize data by considering the questions below.

<b>Types of Data</b>	What type of data do we need to:  Support the type of text messaging we’re planning to do? <i>Examples: client name, native language, SNAP recertification status and deadline</i>  Measure program outcomes and impact? <i>Examples: Age, race/ethnicity</i>
<b>Cadence</b>	How frequently do we need to update client data to send time-sensitive text messages, such as those that encourage clients to finish submitting verification documents or complete their interview?  <i>Examples: Case study updates to track progress</i>
<b>Data Storage and Access</b>	Is all necessary client data stored in the same system or agency, or do we need to pull data from multiple systems to text clients with accurate information?
<b>Data Sharing</b>	What are the regulations around data use and sharing that we need to take into consideration?  Do we need to set up a data sharing agreement?
<b>Data Pipeline</b>	What existing file transfer processes and protocols need to be considered?  What is the capacity of the teams — both our own and the vendor’s — to support developing and maintaining our data pipeline?  <i>Example: transferring and cleaning data for the program</i>
<b>Data Privacy</b>	How are we communicating our privacy policy and the way we are using data to applicants?

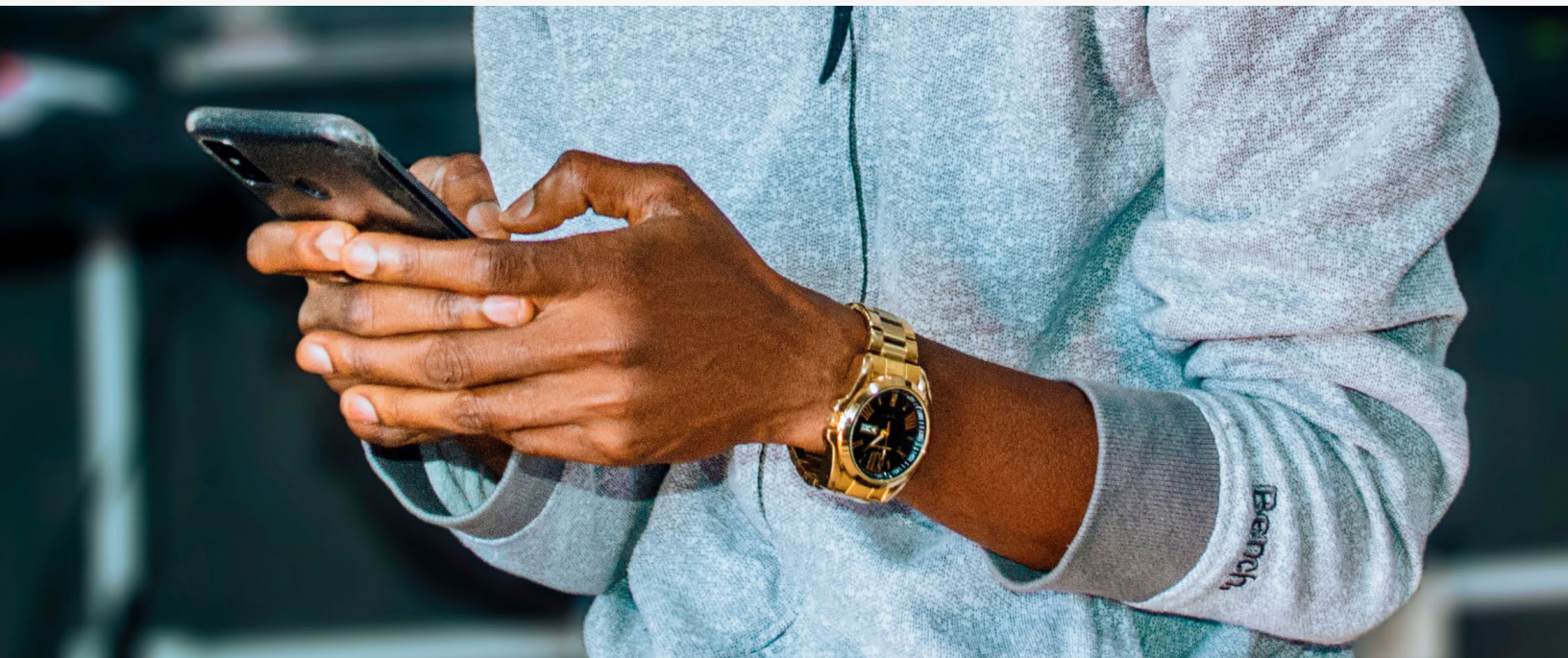


Click on any of the links in this graphic to view or a download standalone guide for that workstream.



**In this section you'll find information on:**

- + [Types of data](#) to initiate and evaluate your text messaging program
- + [Cadence](#) of data updates to support accuracy in time-sensitive messages
- + [Data sharing and data pipeline](#) considerations to ensure a seamless and secure flow of information
- + [Data workstream](#) planning
- + [Appendix](#), including a sample data sharing agreement



## Types of Data

You can launch a text messaging program with a very limited data set. The benefit to this is that you can get a pilot or program up and running quickly. The tradeoff of having the bare minimum data about clients is that you don't know anything about who you are reaching, which can limit your program's potential impact and impede evaluation.

### Core client data

- + Cell phone number
- + SNAP program/case identifier
- + SNAP recertification deadline



Client data reflects heads of households, since that is who you'll be targeting for texting outreach

The more you know about a client, the more you can personalize outreach, which strengthens trust and the relevance of your texts. Code for America has found that using a client's first name can improve response rates by nearly 25%.<sup>1</sup> If you know a client's preferred language, you can send messages in that language. Knowing the status of where a client is in the recertification process means you can send them timely and actionable notifications. Demographic and case information is also useful for understanding the effectiveness of your text messaging program—including where you're seeing the greatest gains and where gaps remain. These insights can be used to make adjustments that further improve program impact and close equity gaps.

### Recommended client data

- + First + Last name
- + Date of birth (or age)
- + Address (or city, county, ZIP code)
- + Email address
- + Sex
- + Race/ethnicity
- + Primary language
- + Income bracket
- + Number of household members and children enrolled in SNAP
- + Case details (e.g., SNAP recertification status, deadline, interview date, etc.)
- + Case manager identifier (if relevant)
- + Cross-system identifiers (e.g., statewide data warehouse IDs, statewide client IDs, national IDs like Social Security number, etc.)

1.Code for America. (2020). Integrated Benefits Initiative: Best Practices in Texting.<http://s3-us-west-1.amazonaws.com/codeforamerica-gms1/documents/IBI-Best-Practices-in-Texting.pdf>

In addition, you will want to collect data on how clients interact with text messages as well as their case outcomes. This information can help you measure the effectiveness and impact of your program at both the client and population levels. Because demographic and personally identifiable information—including phone numbers—are highly sensitive, they'll require stronger protections and additional approvals if you are working with a vendor. Make sure you're involving your policy and legal teams to advise on the precedents for sharing and using this data to anticipate and account for potential issues early on.

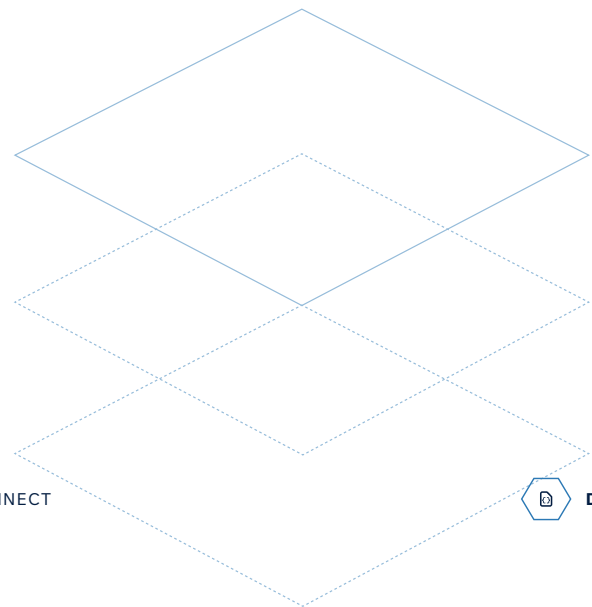
### **Text message data**

- + Number of messages sent and received
- + Delivery rates
- + Number of clients engaging with messages
- + Number of clients opting-out of receiving messages
- + Engagement rates by message

### **Case outcome data**

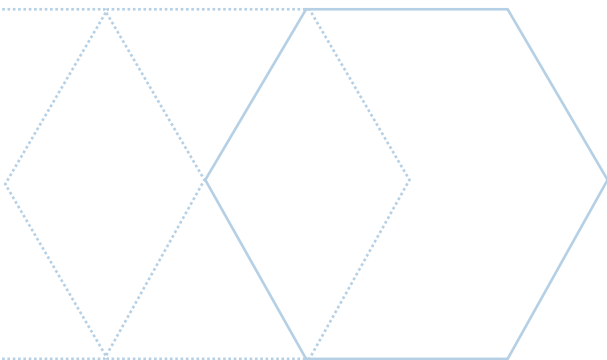
- + SNAP recertification outcome (approved, denied, withdrawn, etc.)
- + Recertification completed online or via paper application
- + Reason for recertification failure

See the [Evaluation guide](#) for more detail about assessing impact and the need to coordinate types of data collected with the program's evaluation plan.



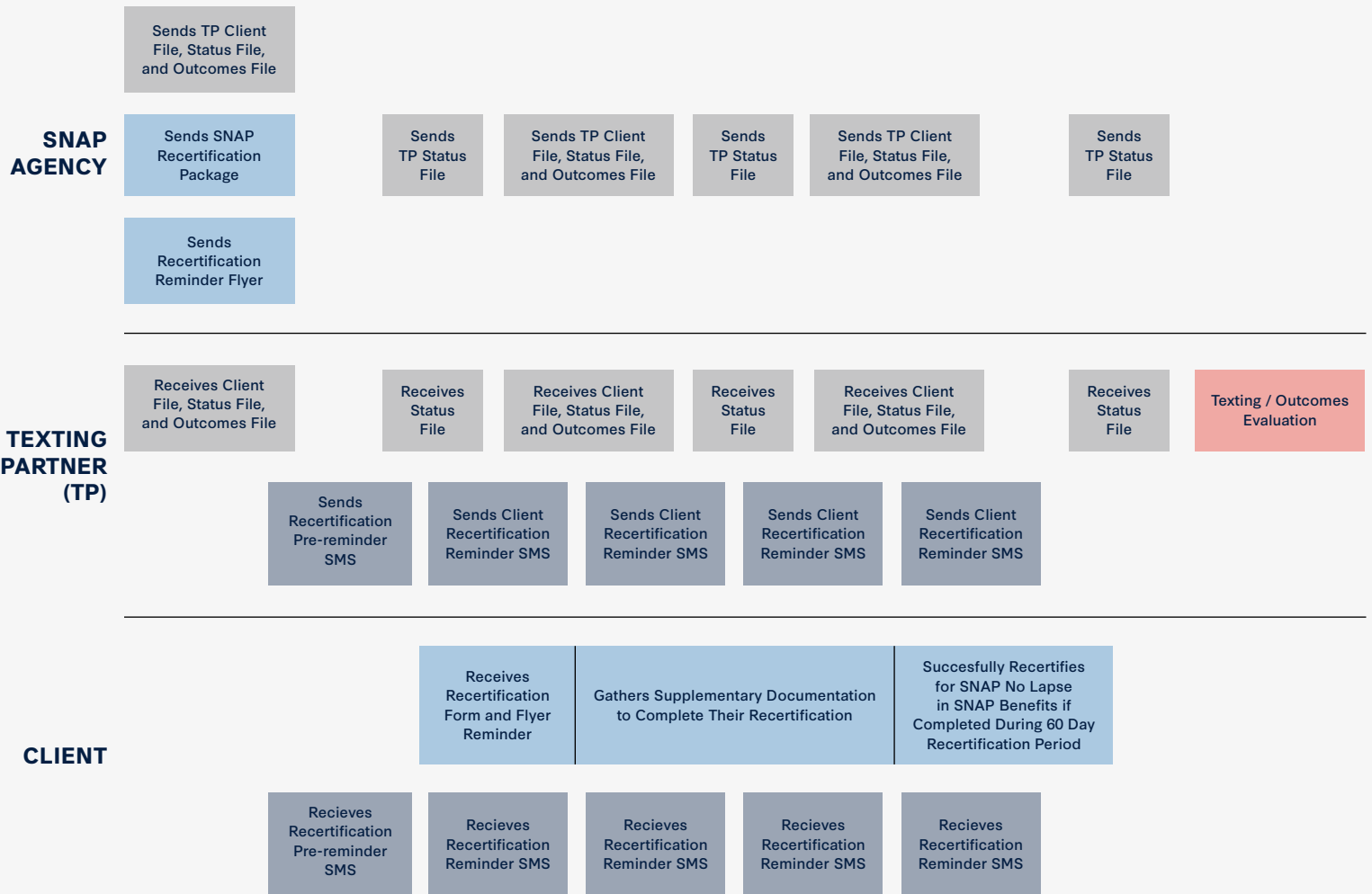
## Cadence

In addition to identifying the data you need about clients, you'll also want to figure out the frequency with which you need to receive it. The more often you pull client data, the more likely it is to be up-to-date. This becomes increasingly important as your text messaging program becomes more sophisticated, but even simpler one-way messaging approaches will benefit from frequent data updates. For example, if you're sending clients time-sensitive nudges to guide them through different steps of recertification, you'll want to have an accurate understanding of where they are in the process. The more frequently a client's case status is updated in the database, the more you can tailor text messages to fit that client's needs. It allows you to remove clients who have completed the entire recertification process from this round of reminders, send a nudge to those who have recertified but still need to turn in verification documents, and so forth.



Sample swimlanes chart showing data transfer cadence when working with an outside vendor

### SNAP Recertification Ideal Path



**Legend**

- Mail Sent / Received
- Data Sent / Received
- Texts Sent / Received
- Texting Evaluation
- Client Recertification

## Data Sharing Agreement

If you'll be relying on a vendor not yet authorized to receive SNAP client data, you'll need to execute a data sharing agreement (DSA). A DSA is a contract that sets the terms around what data is being shared and how it can be used. DSAs are important for protecting personally identifiable information and personal health information, as well as other sensitive data about clients enrolled in benefits programs and ensuring compliance with regulatory requirements. The data included should match what's needed both to execute your text messaging strategy and conduct process and outcome evaluation.

Because a DSA precedes the transfer of data and may take weeks to months to execute, it's important to begin working on it early while other planning activities are underway. While every DSA will be customized, here are some best practices for getting a DSA developed, solidified, and repeated:

- + **Bring your legal counsel, policy, program, evaluation, data, and engineering teams to the table early in the process** so that the DSA and program design are closely aligned. This step also ensures that **privacy laws and other federal, state, and local regulations around protecting, sharing, and using personally identifiable information** are considered from the beginning.
- + Before you start from scratch, **find out if your agency has an existing, vetted DSA template that you can build from**. In most cases, your agency will either have a template or examples of current DSAs in place that you can use as a starting point.
- + **Think about the who, what, where, when, why, and how**. Make sure to specify the data that is being shared, who it is being shared with, and the purpose, which could be logistical or evaluative. An appendix that includes data specifications, data pipeline and security/privacy protocols, technology, and other resources can also be useful for whitelisting how shared data can be used.
- + Where possible, **build flexibilities into your DSA** so that you can make amendments without needing to go through an entire review/approvals process for every program modification. Creating a flexible DSA can save you weeks, if not months, of time during program design and development. In addition to agile development, it can also facilitate continuous improvement and program adaptations over time. The appendix can be a great tool for building flexibility into a DSA by preempting types of changes (e.g., data requirements and file structures, program design and expansion, etc.) that can be made without requiring additional approvals.

You can find a sample data sharing agreement in the [Appendix](#).



## Data Pipeline

The data pipeline describes the process of transferring the data you need from the source (or sources) where it lives to your program database and cleaning it up to be in the format you need to make a successful transfer. If you already have texting capabilities built into your existing system, you may be able to directly import data without the need for a data pipeline. However, if you'll be working with a partner or are running a separate program database (especially if it is built and maintained differently than the source database), this is something you'll need to plan for.

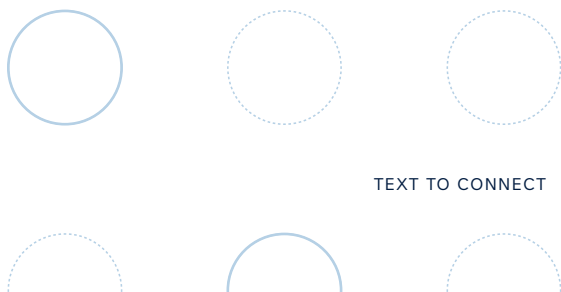
Getting the right data in the right format can take effort and time. But as the backbone of your text messaging program, it's important to get it right. So, you'll want to start this process early and budget enough time to do it well.

The process isn't one-size-fits-all—it can be manual or automated, simple or complex—and will be customized based on factors like:

- + What data you need to run your text messaging program and the frequency you need that data to be inserted or updated in the program database
- + Where the data you need lives and if it is coming from one or multiple sources
- + Whether data variable names are easy to understand
- + How the data is formatted in the source database(s) and the format you need it in your program database
- + How the data can be pulled from the source and loaded into the program database, including any file transfer or security protocols
- + Whether or not you are sharing data with a vendor and the security/privacy consideration on both ends
- + How you plan to maintain your program database, including whether you plan to replace the full data set every time or just update the database with changes and additions, and whether updates to a client's case (e.g., case status changes) overwrite previous data in the source and program databases
- + Whether you plan to make your data pipeline bi-directional so that program data can transfer back to the source database to support evaluation efforts or make text message data available to field staff

Even though your data pipeline will be unique to your needs, the main steps are:

1. extract the data from source(s) where it lives,
2. transform the data into the format you need it in, and
3. load the data into the destination (i.e. the program database) so you can use it for your program. This is often referred to as an "ETL" process.





→ **Source(s)**

This is the database(s) where client data lives and the format the data comes in. To identify your sources, define what client data you need for the program. Then, you'll need to figure out where the data is stored and how it is structured.

→ **Extract**

This is the process of pulling the data you need from the source. Extraction can be manual or automated. As you figure out the best extraction method for your pipeline, consider the source(s), any file transfer and security protocols associated with those systems, and the frequency you need to ingest new data. As a best practice, use an automated and secure file transfer method whenever possible to reduce risk of human error and privacy concerns.

→ **Transform**

This is the process of cleaning up the data set to make sure everything is formatted correctly. Transformation can be manual or automated, and can range widely in complexity. To identify the changes you need to make, define how you want client data to be formatted in the program database and compare that to how the data appears after it is extracted from the source(s). You'll also want to account for factors like whether you're able to extract subsets of client data (i.e., changes and new additions since a specified date) or whether you need to re-import the entire data set with each extraction, and whether changes overwrite previous data or are stored in a historical format. If you have the technical capacity, it's best practice to automate your transformation process, especially if you are planning for a long-running text messaging program at scale.

→ **Load**

This is the process of transferring the clean data into the program database. It can be either a manual or automated process. Like extraction, you'll want to consider file transfer and security protocols associated with the program database as well as the frequency that data is being ingested.

→ **Destination**

This is the database connected to your texting platform. Make sure you've defined the client data you need for your text messaging program and how that should be formatted so that you're extracting from the right sources and setting up a solid transformation process before loading it into the program database.

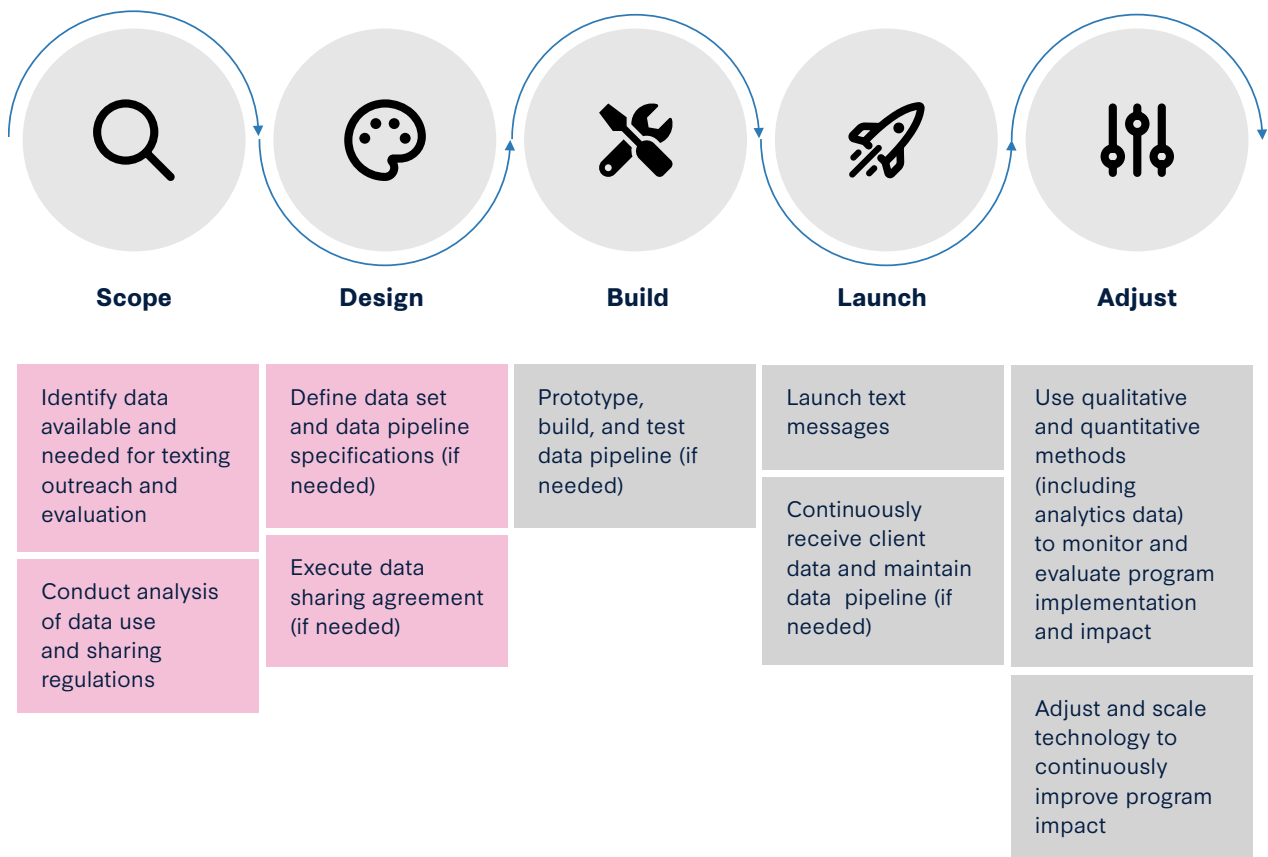


Since data pipelines typically process large volumes of data and can be computationally intensive, you'll want to plan for technical issues. Make sure that technical and non-technical stakeholders have open lines of communication as well as clear guidance and expectations related to issue monitoring, reporting, and resolution.



## Data Workstream Roadmap

Below is a snapshot of what's involved in the data workstream over the project lifecycle. In pink are key scope and design activities, which ensure that you get the data you need for your text messaging program.





# Engineering + Technology requirements for using text message outreach to reduce SNAP churn

Technology is an enabler, but it can also be the sticking point in an organization's policy strategy. This is why it's important to dig into and firm up the technical aspects of your program.

Working with your technology partners and internal IT group you'll want to confirm:

- + Will you contract with a **vendor** to run your texting program, or will you own and manage the platform in-house?
- + If you own and manage the platform, will you purchase something off the shelf or custom-developed?
- + What will the **engineering and technology workstream** look like over the lifecycle of the project?
- + Can your internal resources handle the execution of the program?

This guide can be used by procurement and vendor management specialists or software engineers to get general context on these types of endeavors, or by other project staff to prepare for more technical planning conversations. Begin now to ensure you're putting the right technology in place to achieve your program objectives.





Click on any of the links in this graphic to view or download a standalone guide for that workstream.



### In this section you'll find:

- + A breakdown of [texting platform options](#)
- + [Procurement and vendor management](#), including links to additional resources
- + Considerations for [off-the-shelf and flexible texting platforms](#)
- + Considerations for [in-house engineering](#)
- + Engineering and technology [workstream roadmap](#)



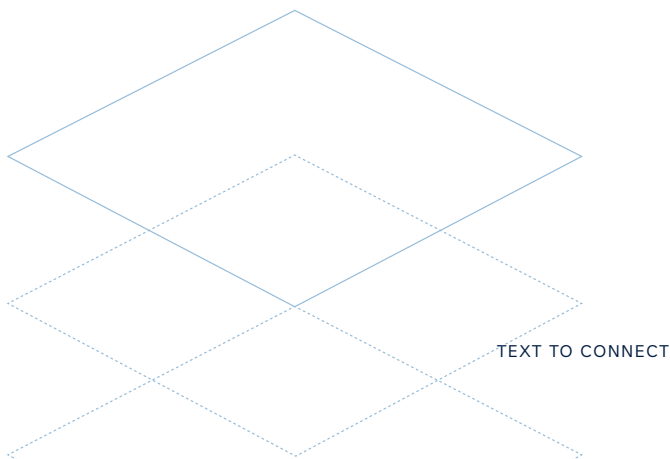
## Texting Platform Options

Each text messaging program will have slightly different technology requirements. When choosing your technology, you should consider how you'll cover the capabilities you need for your text messaging program. For example:

- + Know who, what, and when to text
- + Initiate text outreach with a client
- + Ability to send (and receive) text messages
- + Ability for caseworkers to text directly with clients (if relevant)
- + Way to analyze outcomes from your text messaging program

Adding new pieces of technology to your system can be a big endeavor. Before introducing any new technology, the first thing you should do is to work with your engineering team to take stock of your existing resources (either internal or third-party) to save time. **Notably, if your case management system has the ability to send text messages, work with system administrators to use that feature.**

If you don't have existing texting functionality, there are a few different approaches you can take, depending on whether you're planning to outsource the technological aspects of the project or do it yourself. If you are considering outsourcing, we advise following best practices for Procurement and Vendor Management, as outlined later in this section.





The two main options for outsourcing the technology piece are:

**Partnering with a vendor** to handle your text messaging program for you, which includes managing the texting platform. This option offers one of the lightest lifts for your engineering team—especially if the partner organization takes on building the data pipeline—making it a good fit for agencies with limited in-house engineering capacity. That said, partnering with a vendor also comes with a number of other operational considerations.

**Procuring an enterprise solution** that can be built and maintained for you. This option can allow for customization without the need for in-house engineering resources, while still allowing your agency to have full control. However, enterprise solutions can be very expensive and complex, and are not necessary (or advised) for most text messaging programs.





If your agency is planning to own your texting platform, there are three main categories of options, with variation within each:

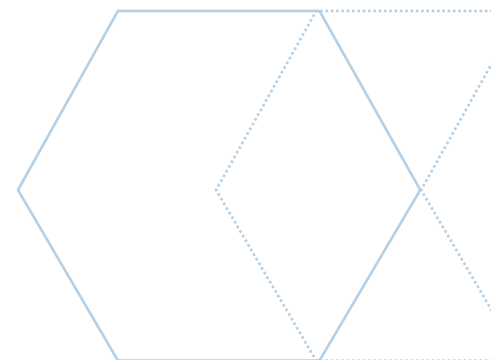
1. Use an **off-the-shelf texting platform** like SimpleTexting or Teletask. Going with a full-featured, hosted platform is a safe choice for agencies that are planning to run a simple text messaging program (e.g., one-way texting) or lack engineering capacity. Many of these services offer all of the functionality you need to run a text messaging program and take care of the backend infrastructure too, so it can be relatively cost-effective and easy to stand up and maintain. Depending on the size and complexity of your campaign, it's possible to upload client data, create the text messaging flows, and begin sending messages the day you create an account. On the other hand, off-the-shelf platforms may be less customizable and flexible, and provide less visibility and control over the backend systems.
2. Take a **hybrid approach**, using a flexible texting platform with some in-house engineering. This option works well for agencies that have slightly more complex texting needs and the resources to take on a low-to-medium engineering lift. Platforms like Twilio provide the SMS API to send and receive text messages, along with a suite of other features (such as analytics capabilities and hosted servers) so that you don't have to build and manage them yourself. They often also come with the ability to layer additional capabilities or plug in more advanced, custom-built components as your program needs evolve. That said, because these platforms are not fully off-the-shelf, your engineering team may be responsible for managing your client database and building some of the notification logic. In general, this approach is a cost-effective option that offers more flexibility for customization and greater control over your systems, without requiring your engineering team to build and maintain everything.
3. **Develop your system in-house.** Developing a texting platform from scratch is a high-risk option if you're just starting out because the process requires substantial engineering resources to build, integrate, and manage all of the different technology components on your own. The more complex and sophisticated your technology needs, the greater the engineering burden required to support them. While this approach gives you the ability to fully customize your technology and keep complete control over your system, this level of investment isn't necessary (or advised) for most texting programs.

## Procurement and Vendor Management

If you need to purchase new technology or services, you'll want to work closely with your procurement team to select technologies, approaches, and vendors that work with your existing systems, fit with your security, budget, and procurement protocols, and are aligned with the objectives of your agency. It's important to think of procurement and vendor management as processes that you need to actively engage with to ensure you're getting what you need. Make sure that you have a dedicated team member in-house with the subject matter expertise to help the procurement team develop a request for proposals (RFP) or request for information (RFI) that focuses on the services and outcomes you want (instead of the specifics of a product a vendor should produce), vet potential vendors, and manage vendor relationships. For example, if your RFP is too long or the contract size too large, you may accidentally be weeding out smaller, more specialized vendors that may be a better fit for your needs. Another good practice is to build a component of upskilling into vendor contracts so that you can leverage those relationships to build up your in-house team's capacity and empower them to be co-owners who can manage the project and technology longer term.

For more information and best practices on procurement, check out:

- + [State Software Budgeting Handbook: Budgeting and Overseeing Tech Projects](#), 18F
- + [Procuring Differently: How Colorado Used User Research and Active Vendor Management for COVID-19 Technology](#), Beeck Center for Social Impact + Innovation
- + [USDA's FNS Handbook: Advance Planning Document Process: A State System's Guide to America's Food Programs](#), USDA
- + [Considerations When Selecting a Text Messaging Vendor](#), Seattle & King County Public Health

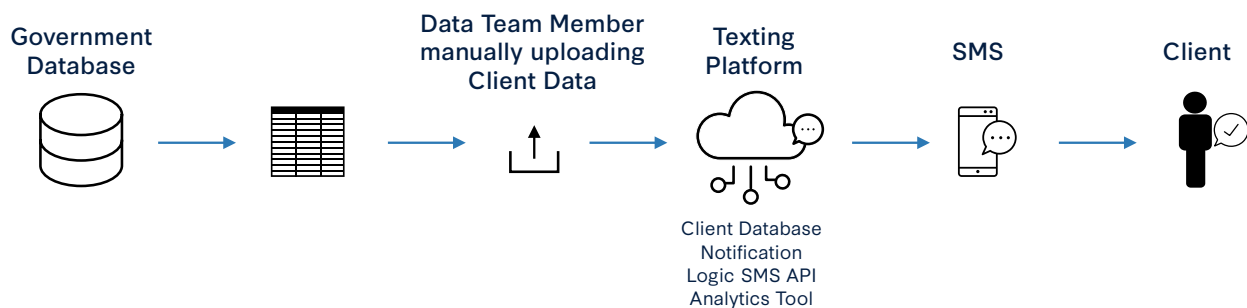


## Considerations for Off-the-Shelf and Flexible Texting Platforms

When selecting an off-the-shelf texting platform (a full-featured, hosted texting platform), you'll want to make sure that the service provides all of the functionality you need to run your text messaging program, without the need for engineering. In general, look for a vendor that offers the following features: SMS API, notification logic, client and notification database, hosted servers, and analytics tools.

If you're planning to take a hybrid approach, using a flexible texting platform with some in-house engineering, you won't necessarily need all of the bells and whistles. Instead, work with your engineering team to select a platform that provides the functionality you need, based on which pieces you prefer to integrate or build yourself. For example, you may only need a platform providing the SMS API, hosted servers, notification database, and analytics tool if you're planning to maintain and integrate a separate client database and write the code for the notification logic.

### Sample architecture for an off-the-shelf texting platform where client data is manually uploaded



Flexible texting platforms are designed to make it easy to layer new capabilities, integrate with other technologies, and replace certain pieces with your own custom code. These customizations may be important if you are taking a hybrid approach, or may be flexibilities for you to consider as your program evolves and scales with time.

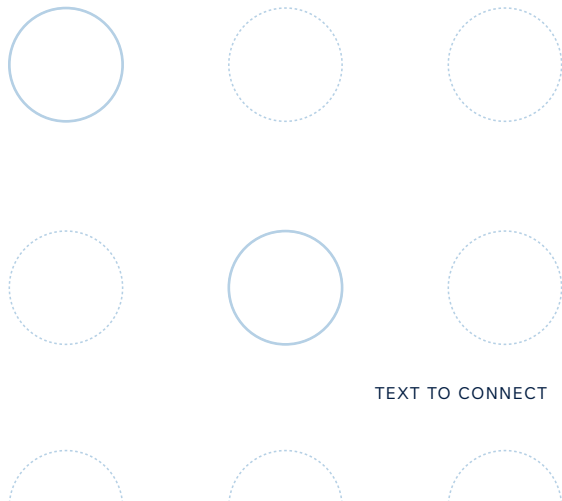
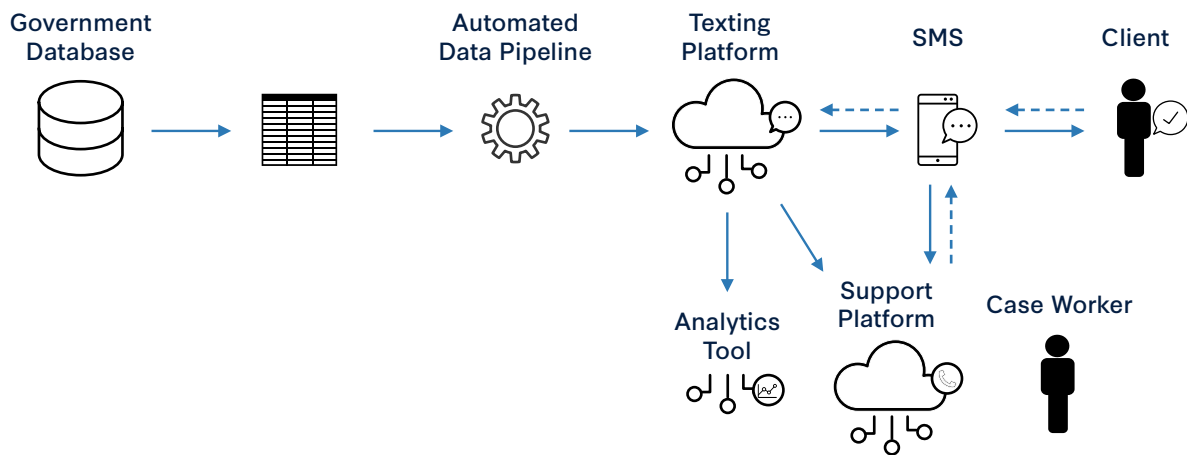
For example, if you decide you want to add human-assisted two-way texting, many texting platforms offer a communication interface feature to facilitate direct messaging between field staff and clients. You could also set up an integration with a support platform like Salesforce or Zendesk to automatically update case files when clients receive and respond to text messages and allow caseworkers to message clients with follow-up actions as they process recertification forms and verification documents.

Most texting platforms will offer basic analytics functionality, but you may also choose to export data from

the platform or build integrations with other analytics tools like Looker or Tableau to augment your reporting capabilities.

Additionally, you might choose to automate processes—sometimes this can be necessitated by your program design or as you scale your program. For example, if you need to trigger renewal notice texts as soon as a client’s recertification window opens, you may not be able to rely on weekly or monthly manual data imports. You could automate your data pipeline to run a script that loads new client data into your hosted texting platform to trigger texts on a daily basis.

### Sample architecture for a flexible texting platform with an automated data pipeline and integrations for client support and analytics



## Considerations for In-House Engineering

Whether you're planning to take a hybrid approach (using a flexible texting platform with some in-house engineering) or build your texting system fully in-house, you'll want to work closely with your engineering team to architect a system that fits your agency's needs.

Your engineering team will be able to tell you if you already have the right technology in place or if there are components you need to get. You'll also want to consider the level of complexity you want to take on as you make technology decisions. In general, if you're looking to maintain full control of your systems and maximize customization, and you have the engineering prowess to set up and manage your infrastructure, you may decide to opt for self-managed tools. Going with managed tools may be a better bet if you are planning to take a hybrid approach or prefer to have your providers host your servers and databases.

Below are the main technologies involved in most text messaging programs. Each technology decision comes with varying degrees of complexity.



### Texting Platform

There are two capabilities you need in your texting platform. The first is the ability to send and receive text messages to clients—this is the SMS API. The second is the logic that coordinates with the client and notification databases to tell the SMS API who to send what messages and when. For example, when a client is added to the client database, the notification logic triggers the SMS API to add them to the texting flow. If your existing system already has the ability to send text messages, work with system administrators to use that feature. Otherwise, you can custom build your own notification logic in conjunction with an SMS API like Twilio or Bandwidth. Some flexible texting platform services may also handle both the SMS API and notification logic for you.



### Databases

These are where data related to your program is stored. The client database houses information about clients you are using for the program. The notification database stores the information about the text messages sent to and received from clients. Depending on how you set up your texting platform, these databases could be separate or integrated. The simplest option is to use your existing database infrastructure. If you need to procure a new database, you can either self-manage your database or go with a managed database like Heroku PostgreSQL, Amazon RDS, or Azure SQL.



### **Servers**

This is where everything related to the texting program is hosted. Depending on your engineering team's preferences, you may want to use your existing cloud-based or onpremise server infrastructure or spin up new servers specifically for your text messaging program. Otherwise, you could go with a hosted service like Heroku or self-managed cloud services like Google Cloud Platform or Amazon Web Services (AWS).



### **Analytics Tool**

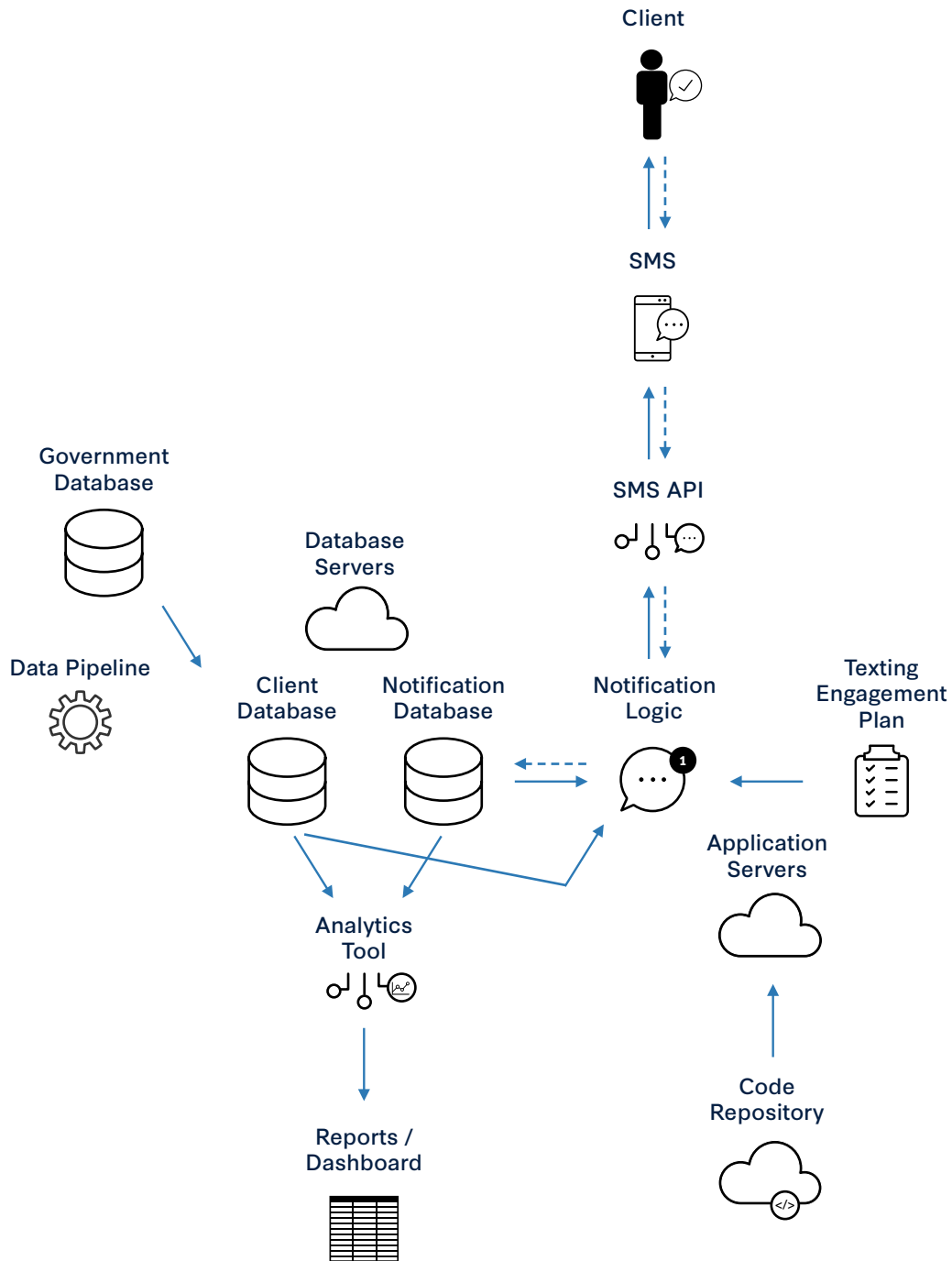
This allows joining of client and notification data to generate dashboards or reports that show a complete picture of the client record and action in one place and facilitate program evaluation. Work with your engineering, data, and research/ evaluation teams to choose a tool that aligns with their workflows and other needs. These teams might already have an existing analytics tool you could use. If you want to create dashboards and visualizations, you may want to use a tool like Looker, Tableau, or Power BI. If you're trying to run heavy analyses and models, then you may want to write and run code in languages like Python or R.

## **Flexible modeling**

As a best practice, use flexible modeling rather than hardcoding when programming your texting engagement plan into your texting platform. Hardcoding assigns a specific response to trigger a specific message. This means you can only use "reply 1" as an option once, since every time a client sends back "1", they'll get the same message no matter where they are in the flow. Flexible modeling allows you to reuse response options because it takes into account variables like the interaction layer (i.e., where the client is in the message flow). This means you can give clients an option to "reply 1" multiple times throughout the same message flow, while still triggering relevant follow-up messages. This is particularly important to keep in mind if you're developing your texting system inhouse or just using an SMS API, as your engineering team will need to write code to keep track of where a client is at in the texting flow. If you're using a full-featured, hosted texting platform, you may already have flexible modeling built-in.

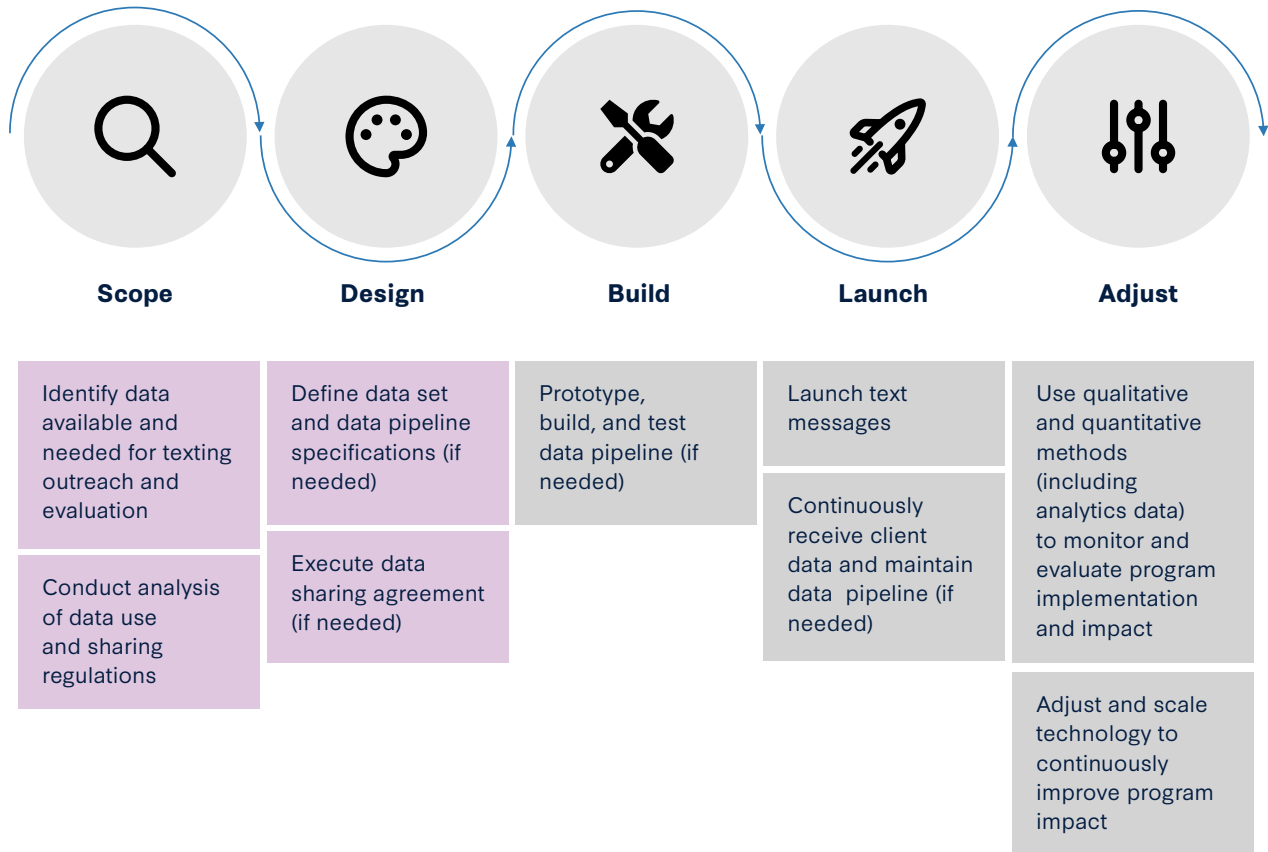
### Sample architecture for an in-house texting system

To give you a sense of how the different technology components fit together and interact with each other, here's an example of what the architecture for an in-house texting platform might look like. Yours may look slightly different, depending on how you've designed your text messaging program and the technologies you use.



## Engineering + Technology Workstream Roadmap

Below is a snapshot of what’s involved in the engineering and technology workstream over the project lifecycle. In purple are key scope and design activities for architecting your texting platform.



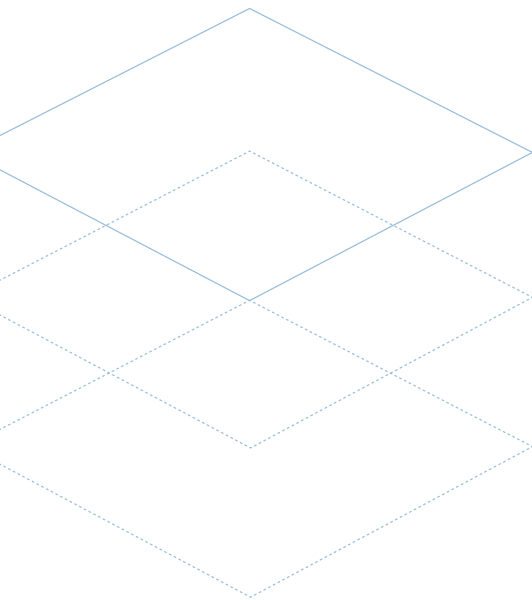


## Conclusion

This guidebook on text messaging for SNAP recertification was released in October 2021, months after the enactment of the American Rescue Plan (ARP). This is an optimal time for the government agencies that administer SNAP to consider investing in improvements to benefit delivery. The U.S. Department of Agriculture - Food and Nutrition Service issued a guidance document that encourages state agencies to direct ARP funds toward investments in technology that improves client access to SNAP, including text messaging.<sup>31</sup>

We hope that this guidebook equips you with the insights you need to successfully navigate key considerations when developing a text messaging program for SNAP recertification that fits your agency's objectives, priorities, and capacities.

We would like to get your feedback on the guidebook and learn more about what your experience implementing text messaging is like. To reach us, please email [digitalbenefits@georgetown.edu](mailto:digitalbenefits@georgetown.edu) and [partnerships@bdtrust.org](mailto:partnerships@bdtrust.org).



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<sup>31</sup>Shahin, J. (2021). SNAP State Administrative Funding - American Rescue Plan Act of 2021 Policy Memo/Guidance Document. U.S. Department of Agriculture - Food and Nutrition Service. <https://www.fns.usda.gov/snap/state-administrative-funding-american-rescue-plan-act-2021>

# Glossary

To help navigate technical terminology or terms of art in the report, here's a list of key terms and what they mean in the context of this guidebook.

- + **LeAgile/agile methodology:** A project management approach for developing software, a service, or a program that's intended to achieve an end result (e.g., reduced SNAP churn) but that is flexible enough to allow for changes based on new information and frequent testing and iteration. For more information, see [Agile Principles and ISF Practices](#).
- + **Analytics Tool:** Software that helps you retrieve, combine, and analyze data to generate dashboards or reports for program evaluation. See the [Engineering and Technology guide](#) for more information.
- + **Churn:** Client "churn"—when a household exits SNAP and then re-enters the program within a relatively short period of time, such as 3-4 months—is a longstanding pain point for clients, field staff, and agencies. Most of SNAP churn happens to people who are still eligible, but occurs for procedural reasons. See the [Planning guide](#) for more information.
- + **Clients:** Different government agencies use different terms to refer to people who are enrolled in SNAP benefits, including clients, participants, and residents. In this guidebook we use clients.
- + **Communication interface:** A feature offered within many texting platforms to facilitate direct messaging between field staff and clients. See the [Engineering and Technology guide](#) for more information.
- + **Control group:** In this guidebook, a group of clients that does not receive text messages for a period of time in order to learn whether the text messaging program is correlated with an increase in recertification or reduction in churn. Clients in a control group would continue to receive notifications that they do currently (e.g., as a letter delivered through postal mail). See the [Evaluation guide](#) for more information.
- + **Databases:** Where the data related to a government agency's SNAP program is stored. These may encompass separate databases or integrated databases. See the [Engineering and Technology guide](#) for more information.
- + **Enterprise:** A category of software that serves the needs of large organizations. Typically enterprise software is part of a large software package, suite, or system meant to support the delivery of organizational outputs, like business intelligence, customer relationship management, or data warehousing and management to name a few functions. See the [Engineering and Technology guide](#) for more information.
- + **Equity:** In this guidebook, delivering a text messaging program that proactively and intentionally seeks to remedy any unequal recertification or churn rates between people with different demographic characteristics (e.g., race, ethnicity, age, primary language spoken) or who live in different geographical areas (e.g., urban, rural, suburban). This is meant to address longstanding structural patterns of exclusion based in racism and other social and economic injustices. See the [Planning guide](#) for more information.

- + **Field staff:** Different government agencies use different names for the staff that assists people as they enroll in or recertify SNAP benefits. These names include field staff, caseworkers, eligibility workers, call center workers, frontline workers, and other names. For simplicity, in this guidebook we use field staff.
- + **Flexible modeling:** A software programming practice that, in this context, allows the same text response, such as “I”, to return different messages depending on where a client is in a text message flow. See the [Engineering and Technology guide](#) for more information.
- + **Local number:** Also called 10-digit long codes, this is a 10-digit U.S. phone number with a standard area code prefix. See [Choosing the Right Type of Number for the Job](#) for more information.
- + **Notification logic:** The functionality within a texting platform that allows a programmer to lay out all the possible text message flows within a texting engagement plan. For example, see the Sample two-way automated texting engagement flow, and the [Engineering and Technology guide](#) for more information.
- + **Off-the-shelf:** Ready-made software products that can be used with little or no customization. See the [Engineering and Technology guide](#) for more information.
- + **Provisioning time:** The time needed to request and prepare a number (as in a phone number or a short code) to use to send text messages. See [Choosing the Right Type of Number for the Job](#) for more information.
- + **Recertification:** Also called renewal or redetermination, this is the process required for SNAP clients in which they report and attest to their current household size and income in order to continue receiving SNAP benefits. Clients must recertify their eligibility every six to 36 months, depending on their state’s policy, and have a limited time to do so.
- + **RISQ score:** A Routine Information and Services Quality (RISQ) score, also known as a trust score, a rating that telecommunications carriers apply to organizations that send text messages to a large number of recipients, based on whether the organization has registered appropriately with the carrier, what type of organization it is (e.g., government, nonprofit, business), the purpose of the message, and the records the sender has of recipients opting in to messages. Senders with a high RISQ score are more likely to have their texts blocked entirely or have slower throughput (number of messages sent per second). See the [Legal and Policy guide](#) for more information.
- + **Servers:** An onsite or remote system that stores all the information relating to the text messaging program, and transmits it over a network (like the internet). See the [Engineering and Technology guide](#) for more information.
- + **Short code:** A five- or six-digit phone number designed for sending and receiving text messages. See [Choosing the Right Number for the Job](#) for more information.
- + **SMS:** “Short message service,” which means a text message sent to a phone or similar device over a cellular network.
- + **SMS API:** A software interface that allows text messages to be sent using a computer over a telecommunication network. See the [Engineering and Technology guide](#) for more information.

- + **SNAP:** “Supplemental Nutrition Assistance Program,” a federally-funded social safety net program that provides low-income individuals and households with money for groceries, in the form of a benefit-specific electronic benefit transfer (EBT) card. The U.S. Department of Agriculture - Food and Nutrition Service sets SNAP regulations and funds states to administer SNAP benefits; 10 states delegate administration to counties.
- + **Social safety net benefits:** A system of legislated public programs that provide economic support to low-income, elderly, and disabled residents in the form of cash transfers, funds for food, housing, utilities, and other public programs, such as subsidized health insurance.
- + **Swimlane diagram:** A diagram that allows for visualization of processes or workstreams across different teams or organizations, which are represented by horizontal boxes or “swimlanes.” See the [Planning guide](#) for more information.
- + **Text messaging program:** The term we use in this guidebook to describe the overall effort to plan, build, implement, evaluate, and sustain text messaging outreach to SNAP clients about recertification.
- + **Texting engagement plan:** A document that encompasses what content will be texted, to whom, when, and how frequently. See the [Texting Strategy and Content guide](#) for more information.
- + **Texting platform:** A software platform that includes all or some of the following features needed to run a text messaging program: an SMS API, notification logic, relevant databases, hosted servers, and analytics tools. See the [Engineering and Technology guide](#) for more information.
- + **Throughput:** The number of text messages sent per second through a telecommunications carrier. See the [Legal and Policy guide](#) and the [Texting Strategy and Content guide](#) for more information.
- + **User testing:** The practice of having clients inform and give feedback on the texting engagement plan content before it’s programmed, and on the usability of the text messaging experience before broader launch to more clients. See the [Texting Strategy and Content guide](#) for more information.
- + **Vendor:** The term used in this guidebook to describe the individuals, organizations, or companies that enter contracts with government agencies to provide various services and deliver outcomes. See [Procurement and Vendor Management](#) for more information.

# Appendix

## Additional Resources

Broader use of text messaging to improve social safety net benefits delivery

- + Leveraging Text Messaging to Improve Communications in Safety Net Programs, Center on Budget and Policy Priorities (2019). <https://www.cbpp.org/research/poverty-and-inequality/leveraging-text-messaging-to-improve-communicationsin-safety-net>
- + Launching New Digital Tools for WIC Participants, Center on Budget and Policy Priorities (2019). <https://www.cbpp.org/research/food-assistance/launching-newdigital-tools-for-wic-participants>
- + Targeted Text Outreach Can Increase WIC Enrollment, Pilots Show, Center on Budget and Policy Priorities and Benefits Data Trust (2021). <https://www.cbpp.org/sites/default/files/6-10-21fa.pdf>
- + Using Data Matching and Targeted Outreach to Enroll Families with Young Children in WIC, Center on Budget and Policy Priorities and Benefits Data Trust (2021). <https://www.cbpp.org/research/food-assistance/using-data-matching-and-targetedoutreach-to-enroll-families-with-young>
- + Integrated Benefits Initiative: Best Practices in Texting, Code for America (2020). <http://s3-us-west-1.amazonaws.com/codeforamerica-cms1/documents/IBI-Best-Practices-in-Texting.pdf>
- + LA'Message and LA'Message Pilot: Text Reminders in Louisiana, Code for America (2019). <https://www.codeforamerica.org/features/louisiana-demo/> and <http://s3-us-west-1.amazonaws.com/codeforamerica-cms1/documents/LAMESSAGE-Final-Report.pdf>
- + County Considerations When Designing and Implementing Automated Messaging Programs for Human Services Programs, Colorado Blueprint to End Hunger (2020). <https://static1.squarespace.com/static/5f5a576d6deec24c3172c98e/t/61201498ea0058538645b546/1629492377251/Automated+Messaging+Programs+11-18-20.pdf> and <https://www.endhungerco.org/food-program-marketing>
- + Nudging Benefits Access in the Right Direction, Benefits Data Trust (2018). <https://bdtrust.org/nudging-benefits-access-in-the-right-direction/>

## Background on SNAP recertification and churn

- + Lessons Churned: Measuring the Impact of Churn in Health and Human Services Programs on Participants and State and Local Agencies, Center on Budget and Policy Priorities (2015). <https://www.cbpp.org/research/lessons-churned-measuring-the-impact-of-churn-in-health-and-human-services-programs-on>
- + Understanding the Rates, Causes, and Costs of Churning in the Supplemental Nutrition Assistance Program (SNAP) - Final Report, Urban Institute (2014). <https://www.fns.usda.gov/snap/understanding-rates-causes-and-costs-churningsupplemental-nutrition-assistance-program-snap>

## Opportunities to fund SNAP-related text messaging programs

- + SNAP State Administrative Funding - American Rescue Plan Act of 2021, U.S. Department of Agriculture, Food and Nutrition Service (2021). <https://www.fns.usda.gov/snap/state-administrative-funding-american-rescue-plan-act-2021>
- + Process and Technology Improvement Grants Program, U.S. Department of Agriculture, Food and Nutrition Service. <https://www.fns.usda.gov/snap/process-and-technology-improvement-grants-program>

## Equity in your text messaging program

- + Study to Identify Methods to Assess Equity: Report to the President, U.S. Office of Management and Budget (2021). [https://www.whitehouse.gov/wp-content/uploads/2021/08/OMB-Report-on-E013985-Implementation\\_508-Compliant-Secure-v1.1.pdf](https://www.whitehouse.gov/wp-content/uploads/2021/08/OMB-Report-on-E013985-Implementation_508-Compliant-Secure-v1.1.pdf)
- + Racial Equity Toolkit: An Opportunity to Operationalize Equity, Local and Regional Government Alliance on Race & Equity (2016). [https://racialequityalliance.org/wp-content/uploads/2015/10/GARE-Racial\\_Equity\\_Toolkit.pdf](https://racialequityalliance.org/wp-content/uploads/2015/10/GARE-Racial_Equity_Toolkit.pdf) and <https://www.racialequityalliance.org/resources/racial-equity-toolkit-opportunity-operationalizeequity/>

## Research, evaluation, and usability testing methods and best practices

- + Qualitative Research Practice Guide, Code for America (2020). <https://info.codeforamerica.org/qualitative-research#practice-guide>
- + Quantitative Design Strategies, The Ohio State University College of Social Work. <https://ohiostate.pressbooks.pub/swk3402/chapter/module-3-chapter-2/>
- + Logic Model Development Guide, W.K. Kellogg Foundation (2004). <https://www.wkkf.org/resource-directory/resources/2004/01/logic-model-development-guide>
- + Logic Models for Program Design, Implementation, and Evaluation: Workshop Toolkit, Education Development Center, Inc. (2015). [https://ies.ed.gov/ncee/edlabs/regions/northeast/pdf/REL\\_2015057.pdf](https://ies.ed.gov/ncee/edlabs/regions/northeast/pdf/REL_2015057.pdf)
- + Stakeholder and User Interviews, 18F, <https://methods.18f.gov/discover/stakeholderand-user-interviews/>

- + Contextual Inquiry, 18F, <https://methods.18f.gov/discover/contextual-inquiry/>
- + Privacy, 18F, <https://methods.18f.gov/fundamentals/privacy/>
- + Recruiting, 18F, <https://methods.18f.gov/fundamentals/recruiting/>
- + Incentives, 18F, <https://methods.18f.gov/fundamentals/incentives/>
- + Usability Testing, 18F, <https://methods.18f.gov/validate/usability-testing/>

## Accessible and actionable content

- + Plain Language Guidelines, plainlanguage.gov. <https://www.plainlanguage.gov/guidelines/audience/>
- + Limited English Proficiency Translation Guides, LEP.gov. <https://www.lep.gov/translation>
- + Choice Architecture, Thaler, R. H., Sunstein, C. R., and Balz, J. P. (2010). <https://ssrn.com/abstract=1583509> or <https://www.sas.upenn.edu/~baron/475/choice.architecture.pdf>

## Procurement best practices

- + State Software Budgeting Handbook: Budgeting and Overseeing Tech Projects, 18F. <https://derisking-guide.18f.gov/state-field-guide/budgeting-tech/>
- + Procuring Differently: How Colorado Used User Research and Active Vendor Management for COVID-19 Technology, Beeck Center for Social Impact + Innovation (2021). <https://beeckcenter.georgetown.edu/wp-content/uploads/2021/02/CO-OITCase-Study.pdf>
- + USDA's FNS Handbook: Advance Planning Document Process: A State System's Guide to America's Food Programs, U.S. Department of Agriculture, Food and Nutrition Service (2020). <https://fns-prod.azureedge.net/sites/default/files/resourcefiles/HB901v2.4.pdf>
- + Considerations When Selecting a Text Messaging Vendor, Public Health Seattle & King County. <http://www.nwcphp.org/docs/sms-toolkit/technology/ChoosingVendorGuide.pdf>

## Agile methodology

- + Agile Principles and 18F Practices: 18F Agile based project approach, 18F. <https://agile.18f.gov/18f-agile-approach/>

# Sample Evaluation Dashboards

## Outreach Insights

### Total Outbound Texts

Week	Total Outbound Messages
Week 1	12,019
Week 2	11,483
Week 3	12,687

### Weekly Delivery Rate

Week	Total Outbound Messages	Delivered Rate	Sent Rate	Failed Rate	Undelivered Rate	Total Known Delivery Rate
Week 1	12,019	80.3%	12.8%	0.0%	6.9%	100.0%
Week 2	11,483	79.9%	12.4%	0.1%	7.6%	100.0%
Week 3	12,687	81.3%	12.4%	0.1%	6.2%	100.0%
<b>Total</b>	<b>94,283</b>	<b>82.2%</b>	<b>11.6%</b>	<b>0.1%</b>	<b>6.2%</b>	<b>100.0%</b>



## Demographic Insights

### Race & Ethnicity Engagement

Race & Ethnicity	Number of Client Replies	Engagement Rate
Asian	1,594	2.5%
Black	38,438	60.3%
Native American	1,211	1.9%
Pacific Islander or Alaska Native	446	0.7%
Hispanic	4,335	6.8%
White	22,036	34.6%
Unknown	19	0.0%

### Race & Ethnicity Recertification

Race & Ethnicity	Number of Clients	Engagement Rate
Asian	9,253	2.7%
Black	205,283	59.9%
Native American	61,69	1.8%
Pacific Islander or Alaska Native	1,714	0.5%
Hispanic	25,018	7.3%
White	120,188	35.1%
Unknown	103	0.0%

### Age Engagement

Age	Number of Client Replies	Engagement Rate
18-39 yrs old	34,294	53.8%
40-59 yrs old	20,844	32.7%
60+ yrs old	8,605	13.5%
<b>Total</b>	<b>63,744</b>	<b>100.0%</b>

### Age Recertification

Age	Number of Clients	Engagement Rate
18-39 yrs old	166,557	53.8%
40-59 yrs old	120,291	32.7%
60+ yrs old	5,582	13.5%
<b>Total</b>	<b>342,709</b>	<b>100.0%</b>

### Language Engagement

Language	Number of Client Replies	Engagement Rate
English	61,513	96.5%
Other	2,167	3.4%
Spanish	64	0.1%
<b>Total</b>	<b>63,744</b>	<b>100.0%</b>

### Language Recertification

Language	Number of Clients	Engagement Rate
English	327,287	95.5%
Other	11,995	3.5%
Spanish	3,427	1.0%
<b>Total</b>	<b>342,709</b>	<b>100.0%</b>

### Rural vs. Urban Engagement

County Type	Number of Client Replies	Engagement Rate
Urban	43,792	68.7%
Rural	19,894	31.2%
Unknown	57	0.1%
<b>Total</b>	<b>63,744</b>	<b>100.0%</b>

### Rural vs. Urban Recertification

County Type	Number of Clients	Engagement Rate
Urban	230,986	67.4%
Rural	101,442	29.6%
Unknown	10,281	3.0%
<b>Total</b>	<b>342,709</b>	<b>100.0%</b>

# Sample Data Sharing Agreement

## MEMORANDUM OF UNDERSTANDING BETWEEN [STATE/COUNTY SNAP AGENCY] AND [VENDOR]

This Memorandum of Understanding (MOU) sets forth the terms and conditions between [Vendor] and [State/County SNAP Agency] (collectively referred to as “the Parties”), to partner on SNAP Recertification Texting in [State/County].

### Background

[State/County SNAP Agency] has contracted [Vendor] to conduct outreach to help residents apply for benefits under the Supplemental Nutrition Assistance Program (SNAP) and to assist in SNAP Recertification. Part of that assistance will be in the form of a texting outreach campaign for SNAP Recertification.

### Purpose

The purpose of this MOU is to outline the roles and responsibilities of the Parties to conduct SNAP Recertification texting in [state/county].

### Specific Responsibilities

[Vendor] will:

- Use [Vendor’s] texting platform, and [state/county] level data shared by [SNAP Agency], to send a variety of text messages to clients who are due for their SNAP recertifications.
- [Vendor] will securely manage data and adhere to Appendix Use Case under its contract with [SNAP Agency]. A copy of Appendix Use Case is attached hereto and incorporated into this MOU.
- [Vendor] will create an engagement plan with messaging to include: Reminders to recertify, guidance on where to get started, and resources for those who are experiencing challenges.
- Use historical data provided by [SNAP Agency] to develop an evaluation plan.
- Determine pilot success based on outcome data provided by [SNAP Agency].

[SNAP Agency] will:

- Conduct user research with [state/county] field staff and clients to ensure the language and instructions in text messages make sense and resonate well.
- Provide [Vendor] historical data of SNAP recertifications from [comparison start date] to [comparison end date] and [intervention start date] through [intervention end date] to help estimate potential impact of pilot.

- Provide percentage of clients who returned their recertification packet form
    - % timely
    - % untimely
    - % late
- Provide how many/what percent were successfully recertified, denied, or did not recertify, and reason.
- Participate in meetings with [Vendor] and [SNAP Agency] as needed to discuss progress of the pilot.
- Participate in evaluation efforts by [Vendor].
- Provide [Vendor] with electronic files via an encrypted file through a File Transfer Protocol (FTP) secure account upon commencement of this project and on a twice per week basis moving forward.
- Provide [Vendor] with data file containing SNAP participants who are due for recertification in [state/county] every two weeks. The data file shall include data fields as indicated in the Appendix Use Case.
- Provide [Vendor] with monthly outcome determination data, containing data fields as indicated in Appendix Use Case.
- Provide policy related guidance as needed.

**Duration**

This MOU shall become effective upon signature by the undersigned authorized officials of the Parties and remain in effect until modified or terminated for convenience by either Party or by mutual consent. This MOU may be modified and/or extended by mutual agreement of the Parties. In the absence of an earlier termination or extension, this MOU shall expire on [date].

**DATA SHARING AGREEMENT APPENDIX  
USE CASE: RECERTIFICATION DATA SHARE**

**I. Purpose**

[SNAP Agency] administers the Supplemental Nutrition Assistance Program (“SNAP”) programs for [state/county] and is responsible for accepting and processing applications for low-income clients.

[Vendor] nonprofit organization whose mission is to help people live healthier, more independent lives by creating smarter ways to access essential benefits and services.

[Vendor] seeks to use [SNAP Agency] data specified herein for the purpose of identifying individuals who are eligible for recertification of their SNAP benefits and conduct text-based outreach to such individuals by providing steps for timely recertification of SNAP, pathways for completing SNAP recertification and resources for individuals who need help, and confirm the enrollment of individuals due for recertification.

**II. Authority**

Federal regulations restrict use and disclosure of information obtained from SNAP applicants or recipients to certain persons, including persons directly connected with the administration or enforcement of the provisions of the Food and Nutrition Act or regulations, other Federal assistance programs, federally-assisted State programs

providing assistance on a means-tested basis to low-income individuals, or general assistance programs which are subject to the joint processing requirements. 7 C.F.R. 272.1(c)(1)(i).

Data Recipient, through its relationship with [SNAP Agency], is directly connected to the administration and enforcement of SNAP and shall use and share any information obtained from SNAP applicants and recipients solely for that purpose. Additionally, as an authorized recipient of SNAP information, Data Recipient shall adequately protect the information against disclosure for any unauthorized purposes as required by federal regulations. 7 C.F.R. 272.1(c)(2); and SNAP State outreach plan required under C.R.S. § 26-2-301(4) and SNAP State Outreach Plan criteria developed by FNS.

### **III. Contacts**

- A. The Primary Contact for [SNAP Agency], Provider, is [Name, Title, Contact]
- B. The Primary Contact for [Vendor], Data Recipient, is [Name, Title, Contact]
- C. The Data Governance Manager for [SNAP Agency], Provider, is [Name, Title, Contact]
- D. The Data Governance Manager for [Vendor], Recipient, [Name, Title, Contact]

### **IV. Data Description**

A. [SNAP Agency] shall provide [Vendor] with the resulting data file twice per week, containing SNAP clients who are due for recertification, limited to agreed upon counties. The data file shall include the following data fields:

- a. Name
- b. Address
- c. Phone Number
- d. Date of Birth
- e. Last 4 Digits of Social Security Number
- f. SNAP Case ID
- g. Recertification Due Date
- h. Case Status
- i. Primary Language
- j. Management Team — This will allow [Vendor] to send clients the correct contact information for questions about their recertification
- k. County — This will allow [Vendor] to track clients by county and send client county-specific resources for recertification
- l. Race — For evaluation and analysis purposes. This will allow [Vendor] to monitor project performance by demographic groups
- m. Ethnicity — For evaluation and analysis purposes. This will allow [Vendor] to monitor project performance by demographic groups

B. [SNAP Agency] shall provide electronic files via an encrypted file through a File Transfer Protocol (FTP) secure account upon commencement of this project and on a monthly basis moving forward. The data shall remain in the encrypted file during the transfer and while it is received and held by [Vendor].

C. [SNAP Agency] shall provide [Vendor] with monthly individual determination data via [government system], containing the following data fields:

- a. Government System User ID
- b. Government System Tracking ID
- c. Application Type
- d. Assistance Type
- e. Case ID
- f. Assigned County
- g. Date of Application
- h. Last Name of Applicant
- i. First Name of Applicant
- j. Home Phone
- k. Cell Phone
- l. Program Name
- m. Eligibility Status
- n. Eligibility Date
- o. SNAP Failure Reason (if relevant and available)
- p. Recertification Deadline — This allows [Vendor] to easily link an application to the relevant redetermination cycle

D. The Data comes from [government system(s)]

E. All unnecessary records shall be purged within 12 months from the time they were released, or sooner if it has been determined they no longer serve the stated purpose.

#### **V. Applicable Regulations**

The following protection regulations are applicable to the data being transferred:

- A. 7 CFR 272.1 (C)(1)(i); 7 CFR 272.1 (C)(2)
- B. [State statute number, if applicable]

#### **VI. Authorized Users**

C. [Vendor] Employees involved in data transfers are [Names, Titles, Contacts]

D. All Authorized Users are required to sign Individual Confidentiality Agreements. Data Recipient must maintain copies of signed agreements and furnish them to the Data Provider upon request.