

August 19, 2021

**Honorable Jim McGovern
370 Cannon House Office Building
Washington, DC 20515**

Dear Congressman McGovern,

On behalf of the Western Region Anti-Hunger Consortium (WRAHC) and its eighteen member organizations representing twelve states, we cordially offer this letter to outline the issues to consider as you continue to work towards securing a White House Hunger Conference with the goal of setting hunger-relief policy for the nation. Our organizations are anti-hunger leaders in our communities, advocating for strong nutrition policies, connecting communities to invaluable state and federal programs and resources, and providing direct emergency food relief. We are always grateful for your leadership in ending hunger and look forward to working closely with you to secure the conference and in pursuit of ending hunger. We encourage you to share these recommendations with anyone else you think could benefit from having them.

About the Problem

One in seven people, including one in five children live in poverty in California; in Washington, one in ten people, including one in eight children, live in poverty: the problem of poverty is widespread across the western region, even in states with some of the world's top billionaires. The detrimental and lifelong consequences of childhood poverty and resulting hunger are well documented.¹ According to the Harvard Center on the Developing Child, the toxic stress of living in poverty has negative, life-long impacts on a child's brain development. When children live in poverty, they endure hardships that impair their ability to thrive,² and it impacts their capacity to learn, develop, and thrive as children and throughout their lives.³ Children are less likely to succeed in school and at home, and poverty increases the likelihood that childhood impairments will result in adult dependency on safety net services.⁴ Ultimately, poverty damages a child's chance for economic security as an adult and fuels an intergenerational cycle

¹ See comprehensive summary in Western Center on Law & Poverty Background Paper Child Poverty & Hunger, March 2020.

https://wclp.org/wp-content/uploads/2020/03/WCLP_Background_ChildPovertyAndHunger_March2020.pdf.

² "Family Poverty, Welfare Reform, and Child Development." Greg J. Duncan and Jeanne Brooks-Gunn Source: Child Development, Vol. 71, No. 1 (Jan. - Feb., 2000), pp. 188-196. <http://www.jstor.org/stable/1132232>.

³ Duncan, G and Magnuson, K. 2011. The Long Reach of Childhood Poverty.

http://www.stanford.edu/group/scspi/_media/pdf/pathways/winter_2011/PathwaysWinter11_Duncan.pdf.

⁴ Barton, Paul E, and Richard J Coley. The Family: America's Smallest School. Policy Information Report, Princeton: Educational Testing Service, 2007, and Berliner, David C. Poverty and Potential: Out-of-School Factors and School Success. Boulder and Tempe: Education and the Public Interest Center & Education Policy Research Unit, 2009.

of poverty: children who are born in poverty are three times as likely to be poor at age 40 than children not born in poverty.⁵

While childhood hunger has lifelong consequences, hunger affects [more than just children: seniors, veterans, people with disabilities, LGBTQ people, and people in rural areas also experience high rates of food insecurity and hunger](#). The cost of not protecting people from hunger, and poverty in general, is significant; researchers have estimated that [poverty currently costs the United States around \\$800 billion to \\$1.1 trillion a year](#). In California alone, a recent study estimates that California [spends over \\$7 billion annually in excess healthcare costs as a result of food insecurity – reducing hunger by even 1% would save California alone an estimated \\$600 million annually](#).

Further analyses highlight the role systemic racism plays in driving poverty and hunger, particularly for households with children. The Census Household Pulse Survey reported that by late July, food insecurity among white households with children was 24.2%, but a shocking 37.2% for Latinx and 39.1% for African-American households with children.⁶ While there is no national data for Native American households, previous research in Washington, for example, showed food insecurity among Native households was 2.5 times higher than white households. These long-standing racial disparities in hunger have only been exacerbated by COVID-19 related disparities. With COVID-19 spiking and states forced to undertake new precautions, food insecurity will remain high, driven by record unemployment and related economic hardships.

Hunger is both one of the most consequential outcomes of poverty and also one of the easiest to address, especially considering that America (especially the West) is the food basket for the world. Yet hunger and food insecurity has been persistently high, especially among families with children. What is worse, the COVID-19 public health and economic crises have dramatically increased the number of people facing hunger.⁷ By late October, Census Household Pulse Survey data shows that food insecurity among all households was greater than 20%, and was nearly 30% among households with children.⁸ Analysis of the national COVID-19 Impact Survey revealed that for households with children, [food insecurity roughly tripled from 11.6% to 34.5%](#). Truly astonishing, however, is the rise in child hunger, not just household-level hunger. Prior to the pandemic, less than 5% of households indicated that their children experienced “very low food security.” During the peak of the crisis that had risen to nearly 20%, a rate that barely

⁵ 12 Cuddy, E., Venator, J. and Reeves, R. 2015. In a land of dollars: Deep poverty and its consequences. Brookings Institution. <https://www.brookings.edu/research/in-a-land-of-dollars-deep-poverty-and-itsconsequences/>.

⁶ Schanzenbach, D. and Tomeh N. Visualizing State Food Insecurity. Northwestern University Institute of Policy Research. 2020. <https://www.ipr.northwestern.edu/state-food-insecurity.html>.

⁷ Brookings Institute. 2020. <https://www.brookings.edu/blog/up-front/2020/05/06/the-COVID-19-crisis-has-already-left-too-many-children-hungry-in-america/>

⁸ Bauer, L. 2020. Hungry at Thanksgiving: A Fall 2020 Update on Food Insecurity in the U.S. The Hamilton Project, Brookings Institution. https://www.hamiltonproject.org/blog/hungry_at_thanksgiving_a_fall_2020_update_on_food_insecurity_in_the_u.s.

ebbed with the fall surge.⁹ Food insecurity in households with children remains high even now despite the Child Tax Credit, especially for Black and Latinx low-income households compared to white families.¹⁰

We understand that economic challenges will continue long after the country successfully brings the COVID-19 public health crisis to an end, so it is important to note that our recommendations are based on the understanding that investments in low-income communities both prevent harm to people and are key to getting the economy working again by generating economic activity¹¹ and state and local tax revenues.¹²

Our Requests

First, we hope national leaders will consider a plan that endeavors to end hunger, not just make it more tolerable for those who experience it, and that the administration will aim to do so in ways that prioritize human dignity. The signatories on this letter are using the following principles in guiding our recommendations. We believe that the new administration should seek to reduce hunger by supporting policies which:

- Are informed by people with low-incomes who are given the opportunity to participate in the policy making process;
- Prioritize reduction in poverty and inequality; and,
- Center race equity and inclusion as goals for prioritizing policies, ensuring that policy solutions that will impact those groups of Americans with the highest rates of hunger are prioritized.

With these principles guiding our recommendations, we have developed a list of policies that we would like National leaders to consider when developing hunger-ending priorities and throughout their Administration.

Policies to End Hunger for Consideration

Protect Against Further “Trumpish” Administrative Attacks on SNAP

⁹ Bauer, L. 2020. Hungry at Thanksgiving: A Fall 2020 Update on Food Insecurity in the U.S. The Hamilton Project, Brookings Institution. https://www.hamiltonproject.org/blog/hungry_at_thanksgiving_a_fall_2020_update_on_food_insecurity_in_the_u.s.

¹⁰ Schanzenbach, D. 2021. Predicted Food Insecurity In Last 7 Days, Households With Children By Race/Ethnicity. Analysis of Census Household Pulse Survey. <https://twitter.com/dwschanz/status/1425479712197988354?s=20>.

¹¹ [The Economic Impact of the American Recovery and Reinvestment Act](#), Zande, Mark, Moody's, January 21, 2009

¹² See, for example, state and local tax data in the National Grocers Association's SNAP Economic Impact Report. <https://www.nationalgrocers.org/grocers-impact-america/>.

We are so grateful to the Biden - Harris Administration for taking swift action to repeal many of the Trump Administration's attacks on SNAP recipients, including the recall of:

- The [SNAP Able Bodied Adult Without Dependent \(ABAWD\) Time Limit Final Rule](#) and no longer allow federal attorneys to defend against [D.C. v USDA](#); and,
- The [SNAP Categorical Eligibility Proposed Rule](#).

We are hopeful that they will also consider the recall of the [SNAP Standardization of State Heating and Cooling Standard Utility Allowances Proposed Rule](#).

Congress should also consider taking action to prevent the rule changes from being reintroduced in the future by fully repealing the ABAWD Time Limit¹³ and making SNAP Categorical Eligibility Option required, rather than an option, nationally.

End Xenophobic Immigration Policies that Impact Access to the Social Safety Net

We are so glad that the new administration immediately:

- Rescinded the [Final Rule on Public Charge Grounds on Inadmissibility](#) which was nothing more than a wealth test for immigrants seeking to secure their [Permanent Resident Card \(PDF, 6.77 MB\)](#); and,
- Immediately halted [all interruptions in the Deferred Action for Childhood Arrivals \(DACA\) Program](#) which would prevent DACA recipients from being legally employed.

We are also hopeful that Congress will introduce and pass legislation to [remove the SNAP 5-year waiting period for legal permanent resident adults](#) and expand the definition of legally-present immigrants who can qualify for SNAP and other federal benefits (e.g. DACA, U Visa, and Temporary Protected Status and beyond).

Increase the Benefits Issued Through SNAP

We are grateful that the administration:

- Immediately revised the [guidance on SNAP Emergency Allotments \(EO\)](#) authorized by the Families First Act to comply with [Gilliam v. USDA](#) and allow all states to benefit from the correct interpretation of the Act and [allow for the poorest Americans to receive](#) these emergency allotments (See also: 9th District Court on the same topic [Hall v. USDA](#));
- [Just this week](#), permanently increased benefit amounts in SNAP by [updating the Thrifty Food Plan](#), finding that SNAP benefits were 21% too low to meet basic dietary needs.

¹³ Lee. B. Improving Access to Nutrition Act of 2021.
<https://www.congress.gov/bill/117th-congress/house-bill/1753>.

In addition to these important policy changes that will significantly reduce hunger, we are hopeful that further policy changes will be made and offer the following suggestions:

- Use all available authority to continue, strengthen, and provide for the appropriate scaling of the Double Up Bucks program to support improved nutrition and empower people to make healthier choices;
- Pass legislation, as was proposed by the [Closing the Meal Gap Act of 2021 sponsored by Senator Gillibrand and Representative Alma Adams](#) (previous versions had [112 House Co-sponsors](#)) to move to the Low Cost Food Plan, as well as remove the cap on the SNAP Excess Shelter Cost Deduction that is currently limited \$586 unless one person in the household is elderly or disabled, to adequately respond to the high cost of living in the West; and,
- Immediately reverse the decision (which was reversed from the prior interpretation of 7 CFR § 273.9(vii)) that a government-issued housing stipend or allowance paid to a recipient must count as income in SNAP. This would help military families, former foster youth, veterans and others who receive housing stipends directly then pay them toward verified rent due, in order to save government programs the additional workload of setting up a vendor payment. It would also give governments more ability to help Americans weather the COVID-19 eviction crisis and the ever-increasing homelessness crisis without undermining food security of people already facing homelessness. Here [is a copy of the letter](#) from California's implementation of the new policy in 2011 and correcting their [prior policy \(based on USDA guidance\) from 2003](#). If this cannot be achieved with administrative policy change, it should be achieved with a change to statute.

Take Bold Action Against College Student Hunger

We are grateful for the Biden-Harris Administration's excellent implementation of the temporary expansion of SNAP eligibility to college students who either have \$0 Expected Family Contribution or are eligible for work study as enacted in the Consolidated Appropriations Act of 2021 (Pub.L. 116-260), including the swift [inter-agency cooperation between the USDA and Department of Education](#).

There is much more to be done, however, to address the widespread food insecurity among college students made even more dire by the pandemic, including to:

- Immediately use the administration's statutory authority to deem community college students exempt from the [SNAP student rules](#) as follows:

(e) Students. No individual who is a member of a [household](#) otherwise eligible to participate in the [supplemental nutrition assistance program](#) under this section shall be eligible to participate in the [supplemental nutrition assistance program](#) as a member of that or any other [household](#) if the individual is enrolled at least half-time in an institution

*of higher education, unless the individual— (3) is assigned to or placed in an institution of higher education through or in compliance with the requirements of— (D) another program for the purpose of employment and training operated by a State or local government, **as determined to be appropriate by the Secretary.***

- Immediately seek to secure relief, through waiver of the [SNAP student rule](#) as [requested by Washington and California but denied by the Trump Administration](#) (USDA [Received](#) California's request on 3/26/2020 | [Mass Denial Issued](#) 4/10/2020) or through legislation as proposed by the [Emergency EATS Act introduced by Reps. Jimmy Panetta \(D-CA\) and Jimmy Gomez \(D-CA\)](#), for college students unable to meet the work requirement as a result of the COVID-19 Public Health Crisis.
- Invite legislation that would make permanent the temporary student exemptions in the Consolidated Appropriations Act of 2020 as proposed in [S. 1569 by Senator Padilla \(D-CA\)](#), and end work-based eligibility requirements for low-income college students as proposed in [H.R. 1919 by Representative Jimmy Gomez \(D-CA\)](#), and [S.2515 by Senator Kirsten Gillibrand \(D-NY\)](#).
- We were happy to see temporary support for students with no parental obligation through granting them a waiver of the SNAP Student Rule and would like to see that made permanent through legislation.
- Invite demonstration projects and waivers that would improve access to SNAP for college students which could include:
 - Direct certification for FAFSA applicants with a parental contribution below the SNAP gross income threshold for the first semester of college;
 - Piloting warm handoffs for recent high school graduates who were receiving TANF or SNAP while in high school to assist them in applying for SNAP once they enter college; or,
 - Support projects connecting SNAP to state financial aid offices.
- Allow states to waive SNAP stocking requirements at campus stores to facilitate more certification of on-campus food retailers to accept EBT;
- Immediately allow SNAP E&T programs that enroll people in college-based programs that result in certificates or degrees to use a 1:1 match rate to draw down federal funds; (currently \$1 in local SNAP E&T funds draws down \$.50 in federal funds);
- Identify funding to place one point of contact at each USDA Regional Office as an expert on college student SNAP participation to reduce barriers and under-enrollment of this population (similar to the Obama Administration for SNAP E&T);
- Immediately identify staff and create a unit that has the sole function of inviting and timely facilitation of EBT applications and [Restaurant Meal Program \(RMP\)](#) applications from colleges and universities;
- Establish a workgroup between the Department of Education and the USDA to address college student hunger;

- Seek funding to support 100% SNAP outreach grants for college campuses that implement an outreach plan through the creation of on-campus, work-study jobs;
- Work with the Administration's Higher Education leaders to establish a "meal plan" benefit that would ensure that all Pell Grant-eligible students also receive a meal plan worth 10 meals per week for on-campus eating [as was proposed by California State Senator Stern](#) – or start with a targeted group of people, like former foster youth, as has been proposed in [by California Assembly Member Buffy Wicks \(D-Richmond\)](#); and,
- Pass legislation, currently being drafted by Congressman Panetta to add "college students," to the list of people who can purchase a prepared meal on a college campus that accepts EBT.

End the Eat-For-Work Policies in SNAP

- Invite legislation to eliminate "work for food" SNAP rules, including the three-month time limit for childless adults ages 18-50 [as proposed in H.R. 2809 by Congresswoman Barbara Lee](#);
- Invite legislation that would end mandatory Employment and Training (E&T) SNAP sanctions on individuals and [complementary program sanctions on SNAP benefits for families enrolled in Temporary Assistance to Needy Families \(TANF\)](#); adopt administrative policies that require states to prove that all E&T programs and SNAP complementary program sanctions are free of racial bias and that they are achieving the central goal of the program to reduce hunger; and,
- Immediately seek to secure relief, through waiver of the [SNAP Student Rule as requested by Washington and California but denied by the Trump Administration](#) (USDA [Received](#) California's request on 3/26/2020 | [Mass Denial Issued](#) 4/10/2020) or through legislation as proposed by the [Emergency EATS Act introduced by Reps. Jimmy Panetta \(D-CA\) and Jimmy Gomez \(D-CA\)](#), for college students unable to meet the work requirement as a result of the COVID-19 public health crisis and, for the longer term, invite legislation that would end work-based eligibility requirements for low-income college students as proposed in [H.R. 6565 by Representative Jimmy Gomez \(D-CA\)](#).

Aim to End Child Hunger by Significantly Improving School Meals & Child Nutrition

We are grateful for the recent decision by the USDA to extend Universal School Meals through the current school year and encourage this provision to enact permanent universal free meals for school age children [beyond the 2020-2021 school year](#) through the School Breakfast Program (SBP) and the National School Lunch Program (NSLP). [California and Maine recently enacted full and permanent universal meals](#), and several state legislatures have introduced legislation to do the same, and federal lawmakers should follow suit. We further applaud the

Biden-Harris Administration's American Families Plan that calls for permanent nationwide Summer EBT as well as steps toward universal school meals.

As President Biden has stated, we must build back better. This is an historic opportunity for Congress to ensure that we learn the lessons of the pandemic – not going back to normal, allowing children to go hungry at school, but truly build back better by ensuring healthy school meals for all ([as proposed in H.R. 3115 Omar \(D-MN\)](#)), and [EBT benefits are provided to all low-income children during breaks as well as unanticipated disasters](#) (as proposed by [H.R. 3519 Levin \(D-CA\)](#) & [S. 1831 Murray \(D-WA\)](#)), are our nation's permanent policies. We urge their inclusion in the Budget Resolution or other legislative opportunities in this Congress to stop a major, preventable hunger cliff for our children starting in the 2022-23 School Year.

Until these are achieved, we ask that you:

- Immediately use all authority to stop collection and expunge all school meal debt during the COVID-19 public health crisis or invite legislation that would achieve this goal as was proposed by the [Suspend School Meal Debt Act introduced by Representatives Omar \(D-MN\) and Holland \(D-NM\)](#);
- Immediately restore the option for parents to apply for their child to receive free or reduced priced meals without asking for their Social Security Number (SSN) on the application;
- Immediately pursue policy clarifications that would allow for the retroactive approval of school meals for children whose parents can prove that they were eligible prior to their application for the months that they can prove eligibility and invite legislation, as was proposed in the The No Shame at School Act of 2019 ([S. 1907/H.R. 3366](#)), introduced by Senator Tina Smith (D-MN) and Representative Omar (D-MN), to achieve that goal if it is determined necessary; and,
- Invite legislation to end the reduced price category and provide children, who would otherwise fall into this category with free meals. The reduced price category adds wasteful bureaucracy to the program and undermines the program's goals.
- We were also very pleased to see the establishment of Summer Meals EBT for all children across the Nation this summer and would like to encourage that it be made permanent and that National Leaders establish a Better Out-Of-School Time (BOOST) EBT program which would provide an EBT card for days in which a school is closed or for prolonged campus closure due to declared disaster or emergency, and consider including days that students miss school for personal reasons or as a result of a suspension or expulsion.
- Immediately repeal and replace the [Pandemic-EBT guidance issued by the USDA](#) to implement the [Continuing Appropriations Act of 2021 and Other Extensions Act \(P.L. 116-159\)](#) to allow for ease of implementation to: (a) assume all SNAP eligible households

with children under six are missing pre-school or day-care meals and allow states to serve them through the program; (b) allowing assumptions about interruptions in on-campus meal service based on maps of COVID-19 Public Health community closures; and, (c) allow states to issue P-EBT benefits to school-age children who were eligible for benefits for school year 2019-20 but have been denied under current guidance because they missed their states' application deadline of September 30 or earlier.

- Seek funding to enact school nutrition funding provisions introduced in the first and second HEROES Act that would direct COVID relief funds specifically to school nutrition programs which would not be based on per-meal reimbursements this school year, but based on 2019-20 claiming rates, which would enable districts to purchase needed packaging, reimburse for transportation costs this year, and improve meal quality even in this period of lower participation rates than typical school years;
- Immediately pursue appropriations to increase the value of federal reimbursement to school districts for school breakfasts and lunch, summer meals, child care meals, and after school programs to respond to the COVID-19 crisis and, in the more long term, to allow nutrition quality to reflect evidence-based standards;
- Immediately revise the Unpaid School Meal guidance issued following a workgroup and [Report to Congress](#) required by the Healthy, Hunger Free Kids Act ([Public Law 111-296](#)) and all relevant manuals and instructions in order to pivot the guidance away from supporting “best practices” to prevent lunch shaming and toward [banning lunch shaming](#) practices altogether as [California](#), [Washington](#), Oregon and other states in the West have already started to do. If legislation is necessary, then the Administration should invite passage of the Anti-Lunch Shaming Act that has been introduced by Reps. Michelle Lujan Grisham (D-NM), Rosa DeLauro (D-Conn.). While pursuing this, the Administration could minimally make the unpaid school meal plans already required to be provided to the USDA by Local Educational Entities (LEA) during the 3-year reviews required to be made public by the LEAs online and provided with all school meal applications;
- Immediately investigate whether juvenile justice institutions reimbursed for free and reduced price meals are also charging families of youth for the costs of the same meals ([as was the case in California](#) prior to the elimination of the Juvenile Fees with the passage of state law SB 190 and [SB 1290 which ended juvenile fees altogether](#));
- Immediately review for-profit online school meal application services to ensure that they are not requiring registration or disclosure of non-mandatory private information on school meal applications or the waiver of rights in order to finalize submission. Among others, these application services include:
<https://mealapps.ousd.k12.ca.us/>
<https://www.heartlandapps.com/Terms.aspx?apply=1>
<http://schoollunchapp.com/Terms.aspx?apply=1>
<https://ezmealapp.com/PrivacyPolicy.aspx>
<https://www.myschoolapps.com/Application>

<https://www.lunchapplication.com/AppStart.aspx>

<http://lunchapp.com/TermsOfUse>

- Pursue legislation that would streamline sponsorship by community-based (i.e. non-school) sponsors of out-of-school meal programs year-round using the Summer Food Service Program, as was proposed by the [bipartisan Summer Meals Act](#) (Reps. Young, AK and Larsen, WA), rather than requiring providers to alternate between the Summer Meals program and the Child and Adult Care Food Program to feed the same children, depending on the season;
- Use all administrative authority and pursue legislation that will allow for reduced paperwork burden to certify for free or reduced price meals through the National School Lunch Program (NSLP) by expanding the use of direct certification of children using various means-tested programs; and,
- Provide universal access to WIC to increase access to breastfeeding support and healthy foods during the critical prenatal through early childhood period;
- Invite legislation like the [Wise Investment in Children \(WIC\) Act](#) that extends eligibility for WIC to age six for children not enrolled in school, and extends certification periods for infants and mothers to ensure they get the nutrition they need as their bodies change and grow;
- Use existing administrative authority to fully implement the [National Academy of Science, Engineering and Medicine \(NASEM\) recommendations for the WIC food package published in 2017](#) which include increasing the fresh fruit and vegetable benefit in the Women, Infant and Children (WIC) food package;
- Make a child's eligibility for Child and Adult Care Food Program (CACFP) benefits easier to document and explore available options to increase the use of direct certification for the program;
- Implement paperwork reduction modifications outlined by the [Child and Adult Care Food Program Paperwork Reduction Work Group](#) which will ease administration and encourage greater participation in the program; and,
- Make improvements to the serious deficiency process for child care providers who participate in the CACFP and make the determination appealable.

End Hardship Caused by Overly Aggressive and Questionably Legal SNAP Overissuance Collections:

- Immediately approve of waiver requests from states requesting that overissuances caused by errors that flow out of rapidly implemented COVID-19 be disregarded;
- Immediately approve of waiver requests from states allowing them to [exclude Pandemic Unemployment Compensation as income in SNAP](#) (California's request was [Received](#) 3/26/2020 and [Denied](#) 4/17/2020) as the chaotic PUC distribution will have impacts on overissuance claims for years to come;

- Encourage states to implement equitable claims policies that do not pursue overissuances that were the fault of the state agency and do not push low-income households deeper into poverty, starting with households who have a disabled or elderly member first (note that MA & [CA](#) have this process in place);
- Use administrative action to put an end to states seeking double prosecution of SNAP overissuances in civil administrative procedure and in criminal court (see: Federal Code of Regulations Section 273.16); and,
- Take administrative action to require states to adequately calculate the cost of collections and update their annual SNAP plans to reflect an overissuance collection threshold so that no state has a state plan approved with an overissuance collection threshold that is cost ineffective ([CA](#), CO & MA have developed models for this calculation).

End Rules that Keep SNAP Anti-Hunger Help from Vulnerable Populations

- We applaud the Biden-Harris Administration for proposing in the American Families Plan to end the lifetime ban on people with prior drug felony convictions (as proposed by Rep. Barbara Lee (D-CA) in the [Removing Barriers to Basic Needs Act - H.R. 7916](#));
- Use existing authority or invite legislation to end the ban that disallows receipt of SNAP AND [The Food Distribution Program on Indian Reservations \(FDPIR\)](#);
- Pursue legislation to end the Immigrant exclusions enacted in PROWRA; and,
- Use existing authority to allow veterans who have applied while pending an application for service-connected disability qualify for SNAP under the special rules for people with a disability until or unless their claim has been denied as was proposed in the [Disabled Veteran Nutrition Fairness Act by Rep. Jackie Speier \(D-CA\)](#).

Improve Emergency Food Distribution

We applaud the Biden-Harris Administration for quickly announcing \$1 billion in emergency food resources, yet much of these funds have not been released and more is needed as lines remain long at food banks across the West.

- SNAP and the public nutrition programs remain our best defense against hunger - [SNAP alone delivers at least 9 meals for every 1 distributed by charitable providers](#). Nevertheless, because current benefit levels are inadequate, [nearly 1 in 3 SNAP households still sought emergency food sources prior to COVID](#), and [millions more Americans continue to rely on food banks to eat](#), stay healthy, and survive this crisis;
- Take all actions to prevent the looming federal food cliff of the anticipated loss as much as 50% of USDA foods to the charitable food assistance network compared to 2020:

- Take immediate action by using available funding to make Section 32 purchases to continue food access at current levels provided in CY21, but distribute all foods through The Emergency Food Assistance Program (TEFAP) to ensure equitable access and civil rights protections nationwide;
- Use Commodity Credit Corporation or Section 32 to establish a more robust food assistance program to help with longer term need, along with a SNAP increase and continued child nutrition programs;
- In all such actions, tighten requirements for awardees to contract with local and regional producers to improve transparency for contractors, and enable access for socially disadvantaged and other producers who have never partaken in a USDA procurement program. Additionally, ensure awardees' distribution plans are targeted to ensure food is reaching communities and populations where hunger is greatest, using proven equitable formulas such as in TEFAP; and,
- In addition, invite legislation to provide additional food as well as storage and distribution costs through TEFAP, CSFP, and other commodity programs similar to the FFCRA and CARES Act.
- Take actions critical to maintaining the health and safety of food bank staff, volunteers, and the people they serve, including:
 - Continue guidance in TEFAP and other programs allowing food bank representatives to record self-attestation and signatures, to prevent sharing pens as COVID vector;
 - Immediately reverse guidance in the Commodity Supplemental Food Program preventing food banks from having flexibility with cheese in the food package that has stopped home deliveries and plummeted senior access by 30%;
 - Immediately revise the Federal Emergency Management Authority guidance that emergency food organizations can only be reimbursed for COVID-related food provided to those over 200% of the federal poverty limit that has undermined the ability of states to feed those hurt most by the pandemic, and led to the perverse outcome that those with higher incomes are served through FEMA Public Assistance; and,
 - Immediately extend the National Guard mission, with 100% federal funding for all states, through the end of the pandemic to replace the dramatic loss of volunteers and staff at emergency food providers who continue to face record demand.
- Pursue legislation that would expand existing partnerships between agricultural providers and the emergency food system as proposed by the Farm to Food Bank Enhancement Act introduced by Rep. Jimmy Panetta (CA) and Rep. Fudge, the [Farmers Feeding Families Coronavirus Response Act](#) by Rep. Kim Schrier (WA) and Sen. Bob Casey in the Senate, as well as the Food Bank Access to Farm Fresh Produce Act by Senator Gilibrand;
- Pursue legislation to bolster the capacity of food banks to meet the elevated need for food while facing soaring operational costs, as well as enable small scale producers to

retool, through the Food Supply Protection Act by Ranking Member Stabenow and her Senate Agriculture Committee colleagues; and,

- Pursue legislation to align TEFAP commodities for food distribution with TEFAP commodities for meal programs, ending the requirement for food distribution to collect names, addresses, and signatures of recipients. This aligns with the value of dignity in food distribution.

Ending Hunger Among Elderly Americans

- Provide blanket authority for the Elderly Simplified Application Project and Standard Medical Deductions in SNAP waivers;
- Because it is primarily seniors and people with disabilities who receive the minimum SNAP benefit, increase this benefit level from \$16 to \$30;
- Work with stakeholders to develop cross-agency partnerships to address gaps in food assistance programs for seniors [identified in the West](#) and across the country;
- Take steps to better disseminate existing information that could help state and local entities involved in providing CACFP meals meet the complex nutritional needs of older adult participants, as well as continue to identify additional promising practices or other information on meal accommodations to share with CACFP entities; and,
- With the Social Security Administration, reopen states' ability to submit Combined Application Projects that are [proven to provide superior food access for older adults and people with disabilities](#), and streamline administration for states.

Expand SNAP Consumer Options

- Remove pilot status of [online EBT ordering](#) and assign staff to make it possible for SNAP recipients to make purchases from more local grocers and farmers;
- Using emergency waiver authority, [eliminate the "hot food" restriction in SNAP food purchases at participating grocery stores and expand access to the SNAP Restaurant Meal Program \(RMP\) option](#) to more states. Then act to expand the RMP nationwide by issuing a USDA-approved standard Memorandum of Understanding (MOU) for states to use, allowing approval for multiple locations if they are owned by the same company or franchise, and allowing for targeting specific retail environments (e.g. college cafeterias, senior meal programs with fees, etc.);
- Consider matching state funds used to reimburse SNAP households with an elderly or disabled member or a young child for the delivery costs of food purchased online;
- Support expansion of EBT use [on college campuses](#);
- Make it clear that the USDA will not accept any [proposed waivers or rule or statute changes that would allow for a limiting of food choice in SNAP](#); and,
- Fully staff the USDA's EBT office to ensure timely approval of new EBT retailers and [\(RMP\)](#) applications and assign regional staff to make these approvals in order to facilitate

speedy approvals. Invite legislation that would improve access to RMP during a disaster as proposed by [the SNAP CARRY Act introduced by Rep. Jimmy Panetta](#) and beyond.

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