

Western Regional Anti-Hunger Consortium

2023 Farm Bill Priorities to End Hunger and Support Food Economies

The Farm Bill authorizes the federal food and agriculture programs that determine the health and resiliency of our food systems: how food is grown, what kinds of food we produce, and how accessible will that food be to low-income families. Here in the western region of the United States, home to the top producers of the nutritious food that everyone seeks to put on their tables, the Farm Bill has the potential to impact the livelihood of our struggling family farms and our struggling families. Because even in the midst of agricultural abundance, hunger and food insecurity stubbornly persist: **1 in 11 households in the western states struggled with food insecurity in 2020.**¹

Food insecurity and hunger is higher among Black, Latinx, and Native American households as COVID-19 has exacerbated long-standing racial disparities in hunger. According to data from the Census Household Pulse Survey reported in October 2021, Black and Latinx adults were still more than twice as likely to report that their households do not get enough to eat when compared to white adult peers: 17 percent of Black adults and 16 percent of Latinx adults compared to just 6% of white adults.² A recent study from the Native American Agriculture Fund found that between March 2020-April 2021, half of all respondents that identified as American Indian and Alaska Native experienced food insecurity and 25 percent experienced very low food security or hunger.³

Millions of low-income people throughout the Western Region and the United States are able to access more nutritious food thanks to the suite of programs in Title IV, or the Nutrition Title of the Farm Bill. This includes the Supplemental Nutrition Assistance Program (SNAP), our nation's first line of defense against hunger, which

¹ USDA, Economic Research Service, December 2020 Current Population Survey Food Security Supplement, U.S. Census Bureau <https://www.ers.usda.gov/topics/food-nutrition-assistance/food-security-in-the-u-s/key-statistics-graphics/>

² Center on Budget & Policy Priorities, Tracking the COVID-19 Economy's Effects on Food, Housing, and Employment Hardships <https://www.cbpp.org/research/poverty-and-inequality/tracking-the-covid-19-economys-effects-on-food-housing-and>

³ Native American Agriculture Fund, Reimagining Hunger Responses in Times of Crisis, <https://nativeamericanagriculturefund.org/wp-content/uploads/2018/04/Reimagining-Hunger-Responses-in-Times-of-Crisis.pdf>

helps low-income people including veterans, children, seniors, people with disabilities, and low-wage workers, to buy food from local retailers, grocers, and farmers markets. The Nutrition Title also includes programs that provide commodities and funding that facilitates our charitable network to distribute food to families in need, including The Emergency Food Assistance Program (TEFAP), the Commodity Supplemental Food Program (CSFP), and the Food Distribution Program on Indian Reservations (FDPIR). Furthermore, Washington State is home to the broadest statewide investment made by USDA through the Gus Schumacher Nutrition Incentive Program to support SNAP match programs that incentivizes the purchase of fruits and vegetables by increasing the purchasing power of SNAP.

Food and nutrition are essential for our economic recovery: nutritious food helps adults who are able to work maintain employment, helps students focus on learning, and helps our seniors be active and independent. The 2023 Farm Bill is our opportunity to think foremost of the needs of people experiencing hunger—especially those with greatest needs—in order to build a more equitable recovery, and as a result, a stronger, healthier food system for all.

Loss of Emergency Allotments creating unprecedented hunger cliff

The pandemic proved unequivocally that hunger and poverty are a policy choice, and that government can solve these crises when it acts. In 2021, [child poverty fell to a record low of 5.2%, and food insecurity for households with children fell to a two-decade low](#). Expanded federal response to the pandemic-induced economic crisis, including Emergency Allotments (EAs) provided through SNAP, Pandemic EBT and temporarily available nationwide school meals for all, [made key contributions to that success](#).

However, the [Consolidated Appropriations Act of 2023](#) included ending the EAs prematurely in February 2023. Now many states in the west faces a hunger cliff as EAs end. Every SNAP household will lose at least \$95 per month. [The average person is expected to lose about \\$82 per month and for some households of 1-2 benefits will go from \\$281 to a meager \\$23 a month](#). That's barely enough to afford a loaf of bread, carton of milk and eggs.

The ending of EAs represents [\\$3 billion in monthly SNAP benefits loss](#) across the 30+ jurisdictions that were still providing them, creating widespread hardship and increasing hunger dramatically at a time when gas and food costs have significantly increased. This represents an incredible loss to the food safety net. States and

food banks will not be able to make up for the loss in millions of dollars monthly that these benefits represent. The reduction of SNAP benefits now will be more harmful for our economy which stands on the brink of recession.

We applaud President Biden and Vice-President Harris and the Administration for laying out a vision to eradicate hunger by 2030 through the [White House Conference on Hunger, Health, and Nutrition](#), and consistently elevating priorities to strengthen SNAP in the [USDA's first-ever Equity Commission](#), as well as the [President's FY 2024 Budget](#), including:

- improve SNAP benefit adequacy
- ensure equitable SNAP access for:
 - those currently subject to the inequitable, discriminatory 3-month time limit
 - college students
 - those facing lifetime bans due to the failed, racist war on drugs
 - the inequitable, discriminatory bar on immigrants
 - residents of Puerto Rico and other U.S. Territories
 - Tribal Nations

As you will see below, these and other proven anti-hunger policies have been long-time priorities of the West. The 2023 Farm Bill, on the heels of the great success of interventions in SNAP, the enhanced Child Tax Credit, and other policies that limited poverty and hunger during the COVID-19 pandemic, should embrace these as priorities to advance the future free from hunger we know is possible.

Who We Are

We are the Western Region Anti-Hunger Consortium (WRAHC). Together, we are eighteen member organizations representing eleven states⁴. Our organizations are anti-hunger leaders in our communities, providing direct emergency food relief, advocating for strong nutrition policies, and connecting communities to invaluable state and federal programs and resources. Together, we offer these priorities for Title IV in the 2023 Farm Bill, built collectively through our partnerships with one another and with key stakeholder groups,

⁴ Alaska, Arizona, California, Colorado, Hawaii, Idaho, Montana, Nevada, Oregon, Utah, Washington

including those with first person experience of hunger and representatives of critical populations that must be prioritized.

We envision a Farm Bill built on the following principles:

- Prioritization of food for all, targeting improvements to nutrition assistance programs to close accessibility and benefits adequacy gaps for populations struggling with hunger.
- Centered on the needs of individuals with lived experience of hunger, intergenerational poverty, and systemic racism.
- Provides adequate resources for states and counties to administer nutrition assistance programs with built in flexibility to address access issues unique to the state.

Our policy priorities for the 2023 Farm Bill are as follows

SNAP

- **Improve SNAP benefit adequacy by permanently adopting the Low-Cost Food Plan** to make basic nutrition more affordable: [S. 2192/H.R. 4077](#) (117th), the Closing the Meal Gap Act.
- **Increase accessibility to SNAP for critical populations:**
 - Repeal the three-month time limit on SNAP for certain **working age adults who struggle with deep set barriers with finding consistent employment**: [H.R. 1753](#)(117th), Improve Access to Nutrition Act.
 - Reverse the racially discriminatory policy of prohibiting SNAP to **eligible green card holders** by repealing the five year bar for SNAP, TANF, and Medicaid: [H.R. 5227](#)(117th), LIFT the BAR Act
 - End the unjust rule preventing SNAP access for **low-income college students**: [S. 2515/H.R. 1919](#)(117th), Enhanced Access to SNAP Act (EATS Act).
 - End the ban on SNAP & TANF for individuals with prior felony convictions: [H.R. 2837](#)(117th), Making Essentials Accessible and Legal (MEAL) Act.
 - Eliminate the asset limits test on SNAP, TANF, and LIHEAP, making nutrition assistance more accessible to more **eligible families with children, low-wage workers, seniors, and people with disabilities on fixed incomes**: [S. 1809/H.R. 3822](#)(117th), ASSET Act.
 - Ensure more **working poor households** can enroll in SNAP by setting broad-based categorical eligibility at 200% FPL (as 19 states currently do).
 - Support **single parents** by eliminating state options to tie SNAP to child support compliance.

- Support **people paying high housing costs** and eliminate the cap on shelter deduction.
- 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 \(D-CA\)](#).
- Provide **military families** with equitable eligibility for SNAP by removing the basic housing allowance from the SNAP calculation and strengthening the basic needs allowance for military families. [H.R.9069](#)(117th), Military Family Nutrition Act of 2022. 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 ongoing 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](#).
- **Maintain efficiencies provided by temporary waivers during the pandemic that streamline the administration of SNAP:** reductions in client reporting requirements, elimination of mid-certification period reports, allowance for telephonic signatures without requiring state request, standardization of same-day card issuance, and streamlined verification all have helped state agencies process increased numbers of applications for SNAP despite reductions in staff labor and resources while maintaining program integrity.
- **Improve Disaster SNAP** so that the program can be more responsive to ensure SNAP benefits despite increased frequency of natural disasters caused by climate change (e.g. droughts and wildfires) as well as prolonged crises such as pandemics.
- **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).**
- **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.

- **Permanently restore SNAP benefits** for victims of EBT electronic theft and reimburse states for the costs to restore benefits, ensure states provide timely replacement of stolen benefits, and continuously improve EBT benefit security without sacrificing recipient access (e.g. multi-factor authentication, locking cards, forced re-PIN).
- **Authorize USDA to scale up and improve affordability of online SNAP purchasing.** Goals should include authorization of more retailer approvals including smaller, independent grocery retailers, keep shopping options free (waive minimum order requirements), and improve access to broadband and mobile devices to extend accessibility to more rural communities.
- **Expand the accessibility of using SNAP to purchase hot and prepared food and meals, including full implementation of the Restaurant Meals Program.** This will increase accessibility to nutritious meals for low-income seniors, people with disabilities, people who are unhoused, and low-income college students who have limited food preparation space or physical ability. Expansion of food purchasing options should also be taken into consideration for increasing certifiable online retailers.
- **Streamline Restaurant Meals Program access for retailers and eligible SNAP recipients:**
 - Create an online portal and shorten the approval time for restaurants seeking to become authorized RMP retailers.
 - Create a unit within the USDA that has the sole function of inviting and timely facilitation of EBT applications and Restaurant Meal Program (RMP) applications, including from colleges and universities.
 - Create a national Technical Assistance Center to support RMP applicants and approved retailers, [similar to the successful approach with the National Grocers Association](#).
- **Reduce the federal match requirement for SNAP Outreach.** If SNAP outreach activities were 75% federally funded (instead of 50%) the required funding match that can be a barrier for organizations would be greatly reduced, allowing more community-based and grassroots groups to help connect households to assistance. These community-based organizations that struggle to provide the current 50% funding match requirement to participate in SNAP outreach are often the most trusted messengers to enhance SNAP participation, especially for FNS identified priority populations, including BIPOC, immigrants, veterans, and college students.

- **Expand permissible SNAP Outreach activities to include outreach on other programs and services.**
Permitting SNAP application assistance to address a broader array of services could help connect SNAP clients to essential services for housing, employment, and other basic needs supports.
- **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).
- **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).
- 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;

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

- **Ensure states 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);
- **Limit overpayment claims** to a look-back period of only one year and raise the threshold for which states can pursue claims.
- **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,
- 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).

The Emergency Food Assistance Program

- **Improve TEFAP** so that food bank shoppers can access **more nutritious, culturally responsive food with dignity:**

- **Expand the local purchasing, flexible funds to states** to provide food bank commodities purchased from local and Black, Indigenous, and other socially disadvantaged farmers to secure food items that meet local needs and invests in local food economies.
- Enhance centralized purchasing of commodities by incorporating USDA **AMS plans for local and regional food systems and building pathways for communities to provide input and feedback on commodities purchased for distribution.**
- **Make all TEFAP flexibilities permanent:** flexibilities permitted during the pandemic increase accessibility and efficiency for clients and reduce administrative barriers for providers. These include waiving the requirement to collect personal information and use other food distribution models like drive throughs and home delivery by proxies.
- **Raise the minimum income eligibility threshold to 250%** in order to maximize participation by low-income populations with regards to local needs and costs of living.
- **Increase the authorization for TEFAP administrative grants for Storage and Distribution to \$400 million per year and \$15 million per year for TEFAP Infrastructure Grants.** This funding will help ensure that TEFAP food levels remain steady throughout the food assistance network, continue to help households facing hunger, and support the U.S. agricultural economy. Also, the additional funding will help better cover the cost of distributing TEFAP foods, especially in remote and rural communities.

Commodity Supplemental Food Program:

- **Increase access and enhance CSFP** so seniors can access more nutritious, culturally responsive food with dignity and expand to disabled persons:
 - **Increase the income guidelines.** CSFP is at 130% of the federal poverty guidelines, yet programs like TEFAP and WIC are substantially higher. Enrollment has also decreased during COVID, so increasing eligibility would allow the program to be more fully utilized.
 - **Other strategies that lead to a similar outcome** – in the FDIPR program, there is an automatic medical deduction. Applying an automatic across-the-board medical deduction to the income of all CSFP applicants would also make the program more accessible.
 - **Pilot Project serving persons with a disability through CSFP** – persons with a disability under 60 years of age are not presently eligible for CSFP. They are a food insecure population in America

that could benefit from CSFP. SSI payments are very low, so they would greatly benefit from the program.

- **Expand food bank commodities and product selection** – include additional food options such as fresh or frozen alternatives. Establish a pilot program to try this out.

Hunger for Native Americans/Alaska Natives/Native Hawaiians

- End the prohibition on dual enrollment in FDPIR & SNAP.
- Dedicate a 20% USDA set-aside within each of USDA's existing program authorities to support Tribal organizations, Tribal governments, Native non-profits, and Native producers. This will ensure proper access to federal programs with increased access in adequacy of support to help close gaps in Native food security through a variety of programs that support Native food production and nutrition assistance programs.
- Apply "638" authority so Tribal governments can function as government agencies in administering federal nutrition programs to tribal citizen, including TEFAP, CSFP, SNAP.

GusNIP/SNAP Match

- Restore clear guidance to USDA that nutrition incentive programs designed to give benefits earned with the purchase of fruits and vegetables may be spent on other SNAP-eligible food products. This will make it easier for more states to implement EBT integration of nutrition incentive benefits to increase accessibility and use by SNAP shoppers.
- Eliminate the non-federal match requirement for GusNIP funds.
- Support efforts to provide expanded resources to support state efforts for EBT integration of nutrition incentive benefits.

These recommendations were prepared by the following members of WRAHC:

Cara Durr (AK), Kate Paskievitch (AK), Ron Meehan (AK), Angie Rodgers (AZ), Andrew Cheyne (CA), Cathy Senderling-McDonald (CA), Becky Silva (CA), Itzul Gutierrez (CA), Taiyo Scanlon-Kimura (CA), Nicole Woo (HI), Lorianne Burhop (MT), Elisha Buchholz (MT), Wren Greaney (MT), Jordan Lamport (CO), Shane Piccinini (NV), Matt Newell-Ching (OR), Chloe Eberhardt (OR), Claire Lane (WA), Christina Wong (WA), Joel McClurg (CO), Anya Rose (CO), Jess Bartholow (CA), Kameron Mims-Jones (CA), Ruben Canedo (CA), Aaron Czyzewski (WA)