

Massachusetts SNAP Coalition

Fighting Food Insecurity by Improving SNAP & Child Nutrition

November 23, 2020

Senator Edward Markey
Senator Elizabeth Warren

Representative Katherine Clark
Representative William Keating
Representative Stephen Lynch

Representative Jim McGovern
Representative Seth Moulton
Representative Richard Neal
Representative Ayanna Pressley
Representative Lori Trahan
Representative-Elect Jake Auchincloss

Dear Members of the Massachusetts Congressional Delegation:

Thank you for your leadership in fighting hunger and longstanding support of federal nutrition programs. We are thrilled to join you in welcoming a new federal Administration that embraces compassion and good government. As Massachusetts anti-hunger and social justice organizations, we are writing to urge the Massachusetts Delegation to share our priority recommendations to decrease hunger with the Biden/Harris Transition Planning Team as soon as possible.

Massachusetts is facing the highest increase in food insecurity in the nation due to COVID-19. Currently, about 1 in 7 residents, including 1 in 5 children, are food insecure.ⁱ More than half a million households in Massachusetts receive SNAP to help put food on the table.ⁱⁱ Hundreds of thousands more are eligible for but not receiving the benefit, or are ineligible due to harmful immigrant restrictions – and the SNAP benefit amount is woefully inadequate.

The economic repercussions of the pandemic have been disproportionately borne by low-income, Black, Latino/Latinx, and immigrant communities in the Commonwealth. Economic challenges will continue long after the country successfully deploys an effective vaccine. SNAP and child nutrition programs are a key part of meaningful COVID relief and directly reduce health care costs. Federal nutrition programs also generate significant and essential economic stimulus to states and local economies.

Crafting an equitable and effective anti-hunger agenda should both:

- Ensure SNAP recipients and diverse low-income households have a seat at the table in setting policy priorities, and
- Focus on eliminating racist policies and equitably support groups at the highest risk of food insecurity.ⁱⁱⁱ

With these approaches in mind, we urge the Biden/Harris Administration to focus on the following priority areas in creating policy and legislative priorities to decrease poverty and food insecurity. A number of these initiatives that would require legislative action have been introduced in the HEROES Act or other pending federal legislation.

- 1. Center the voices of SNAP households and people with low incomes** by ensuring individuals with lived experience are involved with all phases of transition planning and implementation. In addition, we urge USDA to conduct a food insecurity and nutrition listening tour in early 2021 to solicit input from core constituencies and recipients.

2. **Eliminate policies that disproportionately harm communities of color and immigrant communities**, including:
 - a. Immediately rescind the Trump Administration “public charge” rule that implemented a “wealth test” to get a green card and has driven an estimated 27,000 to 63,000 Massachusetts residents to avoid applying for or keeping SNAP.^{iv}
 - b. Remove the 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, such as DACA/Dreamers, U Visa victims of violence, and Temporary Protected Status.
 - c. Eliminate punitive “work for food” SNAP rules, including the three-month time limit for childless adults ages 18-50, employment and training-driven sanctions on individuals and families, and work-based eligibility requirements for low-income college students.
 - d. Encourage states to implement equitable claims policies that do not pursue overpayments that were the fault of the state agency and do not push low-income households deeper into poverty.

3. **Immediately rescind the Trump Administration’s proposed SNAP regulations seeking to restrict eligibility and increase and maximize SNAP benefits**, including:
 - a. Ensure COVID relief boosts SNAP grants by 15 percent and the minimum SNAP benefit to at least \$30 per month.
 - b. Exclude Pandemic-related relief, including pandemic unemployment boosts, from countable income for federally funded programs.
 - c. Issue guidance allowing states to expand emergency SNAP allotments to boost SNAP for the lowest income households (Current USDA policy interpretation of the Families First Coronavirus Response Act does not help the lowest income families).
 - d. Decrease access barriers for low income households by waiving the application interview in certain cases and taking other steps to simplify SNAP, with the goal of increased participation and reduced administrative workload for state agencies.
 - e. Protect families and states from errors that flow out of rapidly implemented COVID-19 changes, including receipt of Pandemic Unemployment Compensation.
 - f. Allow all households to claim actual shelter costs as well as medical costs to determine the amount of the monthly SNAP benefit (current rules limit to households with older adults and persons with severe disabilities).^v
 - g. Align the SNAP benefit amount with modern day food costs by tying SNAP to, minimally, the USDA Low-Cost Food Plan instead of the Thrifty Food Plan.
 - h. Provide support to states in reducing SNAP gaps between means-tested programs and SNAP enrollment. For example, before COVID in Massachusetts about 700,000 Medicaid recipients were likely eligible for but not receiving SNAP.

4. **Improve and expand child nutrition programs to ensure no student is hungry**, including:
 - a. Pursue universal free school meals for all K-12 school-age children.

- b. Extend the National School Lunch Program to low-income community college students, ensuring access to school meals while getting a college degree.
- c. Pursue funding to boost the value of federal reimbursement to school districts for school breakfasts and lunch, summer meals, and after school programs to allow nutrition quality to reflect evidence-based standards.
- d. Expand the scope of children who can qualify for direct certification for free school meal status through other means-tested programs.
- e. Provide universal access to WIC to increase access to breastfeeding support and healthy foods during the critical prenatal through early childhood period.

5. Expand SNAP consumer options to increase access to healthy foods, including:

- a. Ensure online EBT ordering is expanded to local grocers.
- b. Eliminate the “hot food” restriction in SNAP food purchases.
- c. Expand access to the SNAP restaurant meal program option to more states.

We look forward to improving federal nutrition programs in partnership with the Massachusetts delegation and the Biden/Harris Administration.

Sincerely,

The undersigned Massachusetts organizations and individuals:

About Fresh	Cambridge Health Alliance
ACO Mercy Care Alliance	Catholic Social Services of Fall River, Inc.
Action for Boston Community Development (ABCD)	CASA Boston
Advocacy for Refugee and Immigrant Services for Empowerment, Shrewsbury, MA	Casa Myrna Vazquez
Allston Brighton Health Collaborative	Central West Justice Center
Amherst Survival Center	Children's HealthWatch
Ascentria Care Alliance	Coalition for a Better Acre
Asian Task Force Against Domestic Violence (ATASK)	Coalition for Social Justice
Association of Haitian Women	Commonwealth Care Alliance
Backyard Growers	Community Action Agency of Somerville
Barbara Wurtzel, Food Bank Volunteer	Community Servings
Belmont Food Collaborative/Belmont Farmers' Market	Community Violence Response Team
Beth Israel Deaconess Medical Center	Council on Aging , Town of Lanesborough
Boston Area Rape Crisis Center	Diane Sullivan, Consultant with the Center for Law and Social Policy
Boston CASA	Disability Policy Consortium
Boston Public Health Commission	DotHouse Health
Brockton SDA food pantry	EMPath: Economic Mobility Pathways
Building Audacity	Erin McNiff, Phoenix Academy Lawrence
Cambridge Economic Opportunity Committee	Food For Free
	Fourth Presbyterian Church of South Boston
	Food Pantry
	Greater Boston Legal Services

Greater New Bedford Community Health Center
Groundwork Lawrence
Helping Our Women
Immigrant Service Providers Group/Health
Jewish Family & Children's Service
Just Roots
Lawrence Community Works
Mass Association of Portuguese Speakers
(MAPS)
Martha's Vineyard Center for Living
Marzieh Bonakdarhashemi, MA Mental Health
Clinician
Mass Farmers Markets
Massachusetts Coalition for the Homeless
Massachusetts Councils on Aging
Massachusetts Food System Collaborative
Massachusetts Law Reform Institute
Massachusetts Public Health Association
Mattapan Family Engagement Network
Mattapan Food and Fitness Coalition
Merrimack Valley Food Bank, Inc.
Metropolitan Area Planning Council
MetroWest Legal Services
National Association of Social Workers - MA
Chapter
Our Neighbors' Table
Pine Street Inn
Project Bread-The Walk for Hunger
Rosie's Place

Roslindale Family Engagement Network
Roxbury Community College- Project Access
Sami Greenberg, Student
Shooting Touch
Sociedad Latina
Somerville Food Security Coalition
Sonia Oliver, MA Anti-Hunger Advocate
SSTAR
St. Francis House
St Vincent dePaul, Corpus Christi Conference,
Sandwich MA
Stavros Center for Independent Living
Temple Sinai of Sharon
The Food Bank of Western Massachusetts
The Food Project, Inc.
The Greater Boston Food Bank
The Open Door
The Senior Center in Shelburne
Three Sisters Garden Project, Ipswich
Townsend Ecumenical Outreach
Veterans Legal Services
Victim Rights Law Center
West End House
Witnesses to Hunger - Boston Chapter
Worcester Community Action Council
Worcester County Food Bank
World Leadership and Inspirational Foundation
Inc.
18Degree

For questions regarding this letter, please contact the Massachusetts Law Reform Institute: Pat Baker, pbaker@mlri.org or Vicky Negus, vnegus@mlri.org.

ⁱ Feeding America, The Impact of the Coronavirus on Food Insecurity in 2020, October 2020.

https://www.feedingamerica.org/sites/default/files/2020-10/Brief_Local%20Impact_10.2020_0.pdf

ⁱⁱ Department of Transitional Assistance, Performance Scorecard, September 2020.

<https://www.mass.gov/doc/performance-scorecard-september-2020/download>

ⁱⁱⁱ According to Census PULSE data, in Massachusetts 1 in 3 Black families and nearly 1 in 3 Hispanic/Latino families are currently food insecure, versus about 1 in 5 white families. Northwestern University, Weekly Food Insecurity Rates during COVID-19. <https://www.ipr.northwestern.edu/state-food-insecurity.html>

^{iv} Blue Cross Blue Shield of Massachusetts Foundation. New Report Sees Major Implications of Revised Federal 'Public Charge' Rule on Health Care in Massachusetts. September 29, 2020.

<https://bluecrossmafoundation.org/press/new-report-sees-major-implications-revised-federal-%E2%80%99public-charge%E2%80%99-rule-health-care>

^v Massachusetts is the third most expensive state in the United States in terms of income needed to afford a 2 bedroom rental. National Low Income Housing Coalition, Out of Reach 2020. <https://reports.nlihc.org/oor>