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Feedback to House Agriculture Committee Past, Present, and Future of SNAP Hearing Series

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Thank you, Chairman Conaway and members of the [House Agriculture Committee](#) for your work over the past two years taking close look at the Supplemental Nutrition Assistance Program (SNAP). Thank you also for the opportunity to provide feedback on the Committee's hearings on the *Past, Present, and Future of SNAP*.

After 18 hearings with over 60 Expert Witnesses providing deep investigations into the mechanics and benefits of SNAP, it is a testament to the program that SNAP can withstand such scrutiny and continue to be recognized as a great American assistance program. As you heard over and over again, SNAP is key to addressing and preventing hunger: it boosts local economies, it promotes child health, and buoys people out of poverty when their wages are not enough. You also heard that it has an extremely low fraud rate, it is responsive to economic downturns, and it is a lifesaver for families during hard times.

SNAP is so much more than a nutrition program. It is central to our national security. As a public health research scientist with over twenty years of experience in studying the health effects of hunger, I can tell you that hunger is *very harmful* to our American way of life. It weakens us as a nation because it causes physical, emotional and mental hardship. It deeply affects a child's development, depresses teenagers to the point of suicide, muffles the ability of adults to contribute to our workforce, exacerbates disability, and haunts our elders.

SNAP is the first line of defense in addressing hunger, and it provides the key to ensuring our country is resilient, powerful, and strong.

I was delighted to provide testimony during one of the Committee's hearings as the Co-Chair of the bipartisan **National Commission on Hunger**. At the point of providing our testimony, we were still finalizing our report. I am happy to share that our unanimous, bipartisan report ***Freedom from Hunger: An achievable goal for the United States of America*** was released in January 2016. The Commission made twenty outstanding recommendations for addressing hunger, and we made 10 recommendations for improvements to SNAP. I still stand by those recommendations, and I revisit the most critical improvements below.

I make three recommendations: 1) Protect SNAP as an entitlement program, 2) make improvements to SNAP, and 3) take action now.

I. Protect SNAP as an entitlement program and keep it strong

Today in the United States over 43 million people rely on SNAP and nearly half of all SNAP participants are children.

Not only has it been found that SNAP improves birth outcomes for our nation's children,¹ but SNAP helps keep kids healthy. SNAP significantly decreases families' and children's food insecurity.

¹ Almond, D., Hoynes, H. W., & Schanzenbach, D. W. (2011). Inside the War on Poverty: The impact of food stamps on birth outcomes. *The Review of Economics and Statistics*, 93(2), 387–403 and Hoynes, H. W., Schanzenbach, D. W., &

Compared to young children in families that were likely eligible but not receiving SNAP, young children in families receiving SNAP were less likely to be underweight or at risk for developmental delays.² It makes sense – when you give families access to resources to purchase food, the kids don't go hungry and are healthier.

Hunger is a form of “toxic stress” and has life long consequences for kids. Toxic stress is a term utilized by neuroscientists and child development specialists to describe acute stress that does not let up. This hardship can become so bad that not only is a child's brain at risk for having truncated development, but also a child's immune system and organ function can also be negatively affected.³ SNAP helps buffer families and kids from this stress. When a family receives SNAP they are less likely to be faced with impossible trade-offs between paying for healthcare costs and paying for other basic needs, like food, housing, heating and electricity.⁴

As witnesses/experts stated numerous times in the course of the Committee's hearings, SNAP is a critical program in addressing hunger and food insecurity. It must keep its entitlement status. As an entitlement program, anyone eligible for the program qualifies, and SNAP is able to respond quickly and effectively during times of increased need. Enrollment in SNAP expands when the economy is weak and decreases as poverty declines. This flexibility allows SNAP to be responsive when there is an increase in unemployment, a national financial crisis, or a natural disaster. As an entitlement program, SNAP is America's way of ensuring that our country is doing its best to protect our children, working families, veterans, the disabled and the elderly.

II. Make Improvements to SNAP

As discussed by the House Agriculture Committee and many of the experts invited to provide testimony there are many ways SNAP can be improved. Below I provide 6 recommendations for improvements.

1. Improve the SNAP Allotment

Congress should allocate funds to ensure that the SNAP allotment matches the true cost of a healthful diet. The USDA and Congress must acknowledge the strong research evidence from the *Institute of Medicine*, along with many SNAP recipients' assessment, that the SNAP allotment

Almond, D. (2016). Childhood exposure to the Food Stamp Program: Long-run health and economic outcomes, *American Economic Review*, 106 (4), 903-934.

² Ettinger de Cuba S, Weiss I, Pasquariello J, et al. The SNAP Vaccine: Boosting children's health. *Children's HealthWatch*, Boston, MA, 2012.

³ Chilton, M., et al., *The relationship between childhood adversity and food insecurity: 'It's like a bird nesting in your head'*. *Public Health Nutrition*, 2015: p. 1-11; Shonkoff, J.P., et al., *The lifelong effects of early childhood adversity and toxic stress*. *Pediatrics*, 2012. **129**(1): p. e232-e246.; Sun, J., et al., Childhood adversity and adult reports of food insecurity among households with children. *American Journal of Preventive Medicine*, 2016. 50(5): p. 561-572.

⁴ Frank, D.A., et al., Nutritional-assistance programs play a critical role in reducing food insecurity. *Pediatrics*, 2010. 125(5): p. e1267; author reply e1267-8.

based on the Thrifty Food Plan is inadequate for a healthy diet.⁵ When a majority of people on the program run out of benefits before their next allotment, or when they are forced to make unhealthy choices just to keep food on the table, Congress needs take responsibility to improve the SNAP benefit calculation that affects the nutritional wellbeing of millions of Americans.

The National Commission on Hunger also promoted this idea. They requested that Congress allocate the funds to demonstrate the effects of increasing the allotment to what's called the *Low Cost Food Plan*. As we stated in the National Commission Report, *"While families are meant to supplement their SNAP allotment with 30% of their own net income after deductions, the combination of the Thrifty Food Plan and additional family dollars are not adequate to provide enough healthful nutrition for their families. Health and nutrition experts, including the Institute of Medicine, contend that the Low Cost Food Plan shows promise in reaching the appropriate nutrition levels for low-income families."*

2. Improve the income disregard to promote work and employment stability

Currently the income disregard for SNAP is 20%. This is much lower than most other assistance programs. The National Commission on Hunger recommended testing the viability of increasing the disregard to promote work and income stability. As we stated in the Commission Report: *"Providing a higher income disregard may reduce the danger of losing benefits before families are ready to transition to self-sufficiency. A higher income disregard may provide families time enough to stabilize their economic situations, and may also promote entry into the workforce and job retention by eliminating a potential disincentive to increase earnings or to engage in work."*

3. Improve SNAP's responsiveness to income fluctuations

Most families on SNAP include caregivers who are working, yet the administration of SNAP—which includes applications, re-certifications, and reporting mechanisms—does not adequately address potential income fluctuations among low-income families. As we stated in the National Commission on Hunger report, *"Families need more time to adjust to changes in their income without completely losing their SNAP benefits. SNAP does have a phase-down of benefits but when families are cut off of the program even due to increased earnings, evidence shows they report increased child hunger."⁶ Congress should allow households leaving SNAP for employment (or for better pay) to have an extension of SNAP benefits to account for pay lags and give the family time to adjust to their new income without experiencing hunger.*

⁵ McGuire S. Institute of Medicine (IOM) and National Research Council (NRC). Supplemental Nutrition Assistance Program: Examining the evidence to define benefit adequacy. Washington, DC: The National Academies Press, 2013. Adv Nutr. 2013

⁶ Ettinger de Cuba S, Harker L, et al. Punishing Hard Work: The Unintended Consequences of Cutting SNAP Benefits Children's HealthWatch, Boston, MA, 2013.

4. Ensure SNAP effectively reaches US military families

During the National Commission hearings, we were surprised and deeply ashamed to hear that almost every naval and marine base in the United States had a food bank nearby that was meant to support active duty military families. Additionally, veterans are often subjected to long wait times for SNAP eligibility determination.⁷

As a result, we investigated a key administrative fix that Congress should address right away. As we stated in the National Commission report, we insisted that active duty military families be able to avail themselves of SNAP. *“For families living off base or in privatized on-base housing, the Basic Allowance for Housing (BAH) is counted as income in the determination of eligibility for SNAP and may prevent or reduce eligibility for SNAP. Congress should enact legislation to exclude the Basic Housing Allotment as income for the determination of SNAP eligibility and benefit levels for families who have an active duty service member.”*

In addition, we sought to find out more information about food insecurity among military families and veterans, and found that there is inadequate information about SNAP participation among America’s military families. Therefore, the Commission stated, *“In keeping with our U.S. priority of national security, [Congress should ensure that the USDA] works jointly with the Department of Defense and the Department of Veterans Affairs to help with collecting data on food security, its causes and consequences, and SNAP participation among active duty military and veterans. They should make this data available to Congress, the President, and to the public at regularly specified intervals.”*

5. Mandate training and infrastructure to improve SNAP processes

The National Commission emphasized the critical need to improve the training for SNAP’s frontline caseworkers. My research shows that hunger and food insecurity are strongly associated with exposure to violence and trauma.⁸ These kinds of hardships demand special care and attention from frontline caseworkers, and a greater sensitivity and compassion from policy-makers.

The National Commission made strong recommendations on this front. We stated that, *“Congress should mandate that the USDA require states to provide comprehensive training and modern infrastructure support for front-line caseworkers that ensures strong knowledge of SNAP eligibility; an emphasis on the importance of positive, culturally competent client service that explores potential other issues applicants face [such as depression, housing insecurity and exposure to violence]. Periodic retraining is also recommended, as program rules change often. Accountability mechanisms to demonstrate high performance on client service and case management standards*

⁷ Mia Hubbard, Vice President of Programs, MAZON: A Jewish Response to Hunger, Testimony provided to the National Commission in Oakland, CA, June 2015.

⁸ Sun, J., et al., Childhood adversity and adult reports of food insecurity among households with children. *American Journal of Preventive Medicine*, 2016. 50(5): p. 561-572; Chilton, M., M. Knowles, and S.L. Bloom, The Intergenerational Circumstances of Household Food Insecurity and Adversity. *Journal of Hunger & Environmental Nutrition*, 2016: p. 1-29.; Chilton, M.M., J.R. Rabinowich, and N.H. Woolf, Very low food security in the USA is linked with exposure to violence. *Public Health Nutrition*, 2013: p. 1-10.

should be built into caseworker performance reviews. The USDA should measure the performance of states relative to customer service, in addition to error rates and timeliness—unless measured, it is unlikely to improve. Office hours extending beyond 9–5 and offsite access points for working families should be encouraged.”

6. Learn from SNAP Recipients

These recommendations above are critical to our nation’s health, and they can be implemented effectively if members of Congress listen to and ensure that people who participate in SNAP can inform the policy-making process in a direct and meaningful way.

Congress should ensure that the USDA creates opportunities for SNAP participants to provide customer feedback on administrative policies, allotment amounts, effective and compassionate communication, and overall quality of the program. This feedback should be supplied to Congress and to the USDA, and should be acted upon by members of Congress, with special attention to ensuring equality and inclusion along the following dimensions: race and ethnicity, heritage, treaty rights, gender, sexual orientation and gender expression, ability, and age.

III. Take action

After so many hearings on SNAP, I know that the House Agriculture Committee is fully prepared to make great improvement to SNAP during the next Farm Bill. The first order of action is to protect SNAP’s integrity as an entitlement program. Secondly, Congress should make improvements that support the health, employment, and national security of the United States. By doing so, Congress will promote our resilience.

Through our strong democratic process, your committee heard from over 60 experts on SNAP. Additionally, our National Commission received testimony from 182 experts on hunger. The vast combined majority of these experts spoke directly to the importance of SNAP, and to ways to improve SNAP’s strong track record. Now that we have heard and considered so much, it’s time to take action.

This Committee has my full support in taking these actions above.